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17	UNITED STATE	CS DISTRICT COURT
	NORTHERN DIST	RICT OF CALIFORNIA
18	OAKLA	ND DIVISION
19		
20	EPIC GAMES, INC.	Case No. 4:20-cv-05640-YGR-TSH
21	Plaintiff, Counter-defendant	DECLARATION OF MARK A. PERRY IN
	V.	SUPPORT OF APPLE INC.'S STATEMENT IN SUPPORT OF MOTION TO SEAL
22	APPLE INC.,	PORTIONS OF THE PARTIES'
23	Defendant Countries	EVIDENTIARY HEARING EXHIBITS
24	Defendant, Counterclaimant	The Honorable Yvonne Gonzalez Rogers
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DECLARATION OF MARK A. PERRY ISO APPLE

INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

CASE No. 4:20-CV-05640-YGR-TSH

I, Mark A. Perry, hereby declare as follows:

- 1. I am an attorney licensed to practice in the State of California, and a member of the Bar of this Court. I am a partner at the law firm Weil, Gotshal & Manges LLP, counsel of record for Apple Inc. ("Apple") in this case. I am familiar with Apple's treatment of highly proprietary and confidential information based on my personal experience representing Apple. I have personal knowledge of the facts stated below and, if called as a witness, would testify competently thereto. I submit this declaration in support of Apple's Statement in Support of the Parties' Joint Administrative Motion to Consider Whether Another Party's Material Should Be Sealed Pursuant to Civil Local Rule 79-5.<sup>1</sup>
- 2. I am aware that the law of this Circuit allows information to be filed under seal for compelling circumstances. I also understand that courts routinely seal filings where documents include non-public financial information, competitively sensitive material, internal project codenames and personally identifiable information ("PII") that may aid bad actors, attorney-client and work product privileged material, sensitive business information relating to third parties, and certain sensitive information that is not relevant to the issues before the court (here, portions of Public Relations ("PR") professionals' internal discussions). I understand that this Court has broad latitude to prevent the public disclosure of these categories of commercially sensitive information.
- 3. Apple operates in an intensely competitive environment. Apple has serious and legitimate concerns that competitors will be quick to capitalize on any release of Apple's highly sensitive information in order to gain competitive advantage. Similarly, bad actors may exploit non-public information to harm Apple. As such, Apple takes extensive measures to protect the confidentiality of its information.
- 4. Apple has carefully reviewed the Court's Order to file the hearing exhibits (Dkts. 1508 and 1509 at 78 n.77), including information disclosed in the Order, and now proposes to seal portions of

<sup>&</sup>lt;sup>1</sup> Courts in the Ninth Circuit routinely grant motions to seal based on declarations of counsel. *See*, *e.g.*, *In re Apple Securities Litigation*, 19-cv-02033-YGR, Dkt. 223 (N.D. Cal.); *In re Qualcomm Litig.*, No. 17-cv-00108-GPC, Dkt. 398-1 (S.D. Cal. Mar. 26, 2018); *Avago Techs. U.S. Inc. v. Iptronics Inc.*, No. 10-cv-02863-EJD, Dkt. 544 (N.D. Cal. Apr. 3, 2015); *Cisco Sys., Inc. v. OpenTV Inc.*, No. 13-cv-00282-EJD, Dkt. 76 (N.D. Cal. Oct. 8, 2013). If the Court deems this declaration insufficient, Apple respectfully requests that it be permitted to file a further declaration supporting filing under seal.

the hearing exhibits that, if disclosed, would harm Apple, its employees, and/or a third-party developer's competitive business interests.

- 5. Apple seeks to partially seal the Parties' evidentiary hearing exhibits. These documents contain: (1) non-public financial information and competitively sensitive material; (2) information that could aid a bad actor; (3) attorney-client and work product privileged material; and/or (4) sensitive business information relating to third-party developers and other business partners; (5) public relations work and extraneous personal information not relevant to the hearing.
- 6. Non-public financial information and competitively sensitive material. Apple asks the Court to seal specific, non-public, competitively sensitive financial information, the disclosure of which would harm Apple. The financial information includes Apple finances, projections, estimates, and developer cost estimates based on proprietary information. Apple also seeks to seal as competitively sensitive certain research reports which were either commissioned by or conducted by Apple to gain unique insights into its services and developers. Disclosure of this material would substantially harm Apple and its partners. Competitors who gain access to these insights could strategically exploit Apple's proprietary knowledge to undermine Apple's business plans, preempt Apple's strategic decisions, and improperly compete by replicating strategies without incurring similar research and development costs. Additionally, those with access to Apple's confidential cost analyses and research could leverage that information to negotiate more favorable terms, weakening Apple's market position. Speculative investors obtaining such sensitive data—divorced from its greater context—could misinterpret or misuse projections and internal assessments, potentially causing unnecessary volatility, investor confusion, and reputational harm to Apple.
- 7. Codenames and PII that could aid a bad actor. Apple seeks to seal its competitively sensitive internal project codenames and personally identifiable information ("PII"). Apple operates in an intensely competitive environment and thus has taken extensive measures to protect the confidentiality of its information. Confidential codenames advance these measures. Disclosure of the information relating to confidential project codenames could harm Apple's business interests and/or aid bad actor third parties to harm Apple, its customers, and developers. Apple also seeks to seal PII, such

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27 28 as employee phone numbers, email addresses, and personalized links to documents or web conference lines. Sealing is necessary here because public disclosure of this information would offer bad actors means to access Apple's confidential materials and gain unfair business insights by obtaining information Apple intended to keep confidential. Apple uses project codenames to reduce the risk of accidental disclosure of sensitive information and streamline security protocols because only cleared personnel possess the knowledge of the codenames' meaning. Disclosure of codenames in conjunction with documents discussing the associated work compromises the protective layer that prevents unauthorized disclosure. Bad actors may also leverage exposed codenames to represent themselves as legitimate internal personnel, increasing the likelihood of successful social engineering or phishing attempts. Disclosure of PII could lead to unwanted contact or harassment and harms the privacy interests of the individuals. Additionally, PII disclosure could harm Apple's business interests and/or aid bad actor third parties to harm Apple, its employees, and/or business partners by providing means for access to confidential information and could lend itself to impersonation attempts (e.g., caller ID spoofing).

- 8. Public Relations Work Planning and Extraneous Personal Information that Is Not **Relevant to the Hearing.** Apple seeks to seal information that relates to PR professionals' private text message conversations that include discussions of hiring and headcount needs, PR work in general, and personal musings, that if revealed, may cause reputational harm and undue attention and harassment of the employees. Much of the information Apple seeks to seal consists of personal and private discussions between two colleagues, and none of this information has any relevance to the substantive litigation topics or the issues before the Court.
- 9. Attorney-client and work product privileged material. Apple also seeks to seal portions of Exhibit CX-0265 that contains a legal memorandum concerning a class action settlement. Disclosure of this content would reveal to Apple's litigation adversaries Apple's confidential and privileged information and certain of Apple's class actions settlement considerations, which may be exploited in other matters.
- 10. Sensitive third-party business information. Apple seeks to seal its information that reflects or relates to sensitive business information of a third-party developer—specifically, finances and

explained above and those described in Apple's Statement in Support of the Parties' Joint Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. Documents filed under seal reflect requested portions for sealing, indicated by yellow highlights, which are narrower than the page citations below.

Below is a chart detailing the portions of the exhibits that are sealable for the reasons

Exhibit and Page	Exhibit Description	Basis to Seal
CX-0009.10	Price Committee Deck dated January 16, 2024 (Dkt. 916-7)	This exhibit should be partially sealed because it contains Apple's non-public financial information and competitively sensitive information, which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace.
CX-0009.11	Price Committee Deck dated January 16, 2024 (Dkt. 916-7)	This exhibit should be partially sealed because it contains Apple's non-public financial information and competitively sensitive information, which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace.
CX-0009.13	Price Committee Deck dated January 16, 2024 (Dkt. 916-7)	This exhibit should be partially sealed because it contains Apple's non-public financial information and competitively sensitive information, which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace.
CX-0009.14	Price Committee Deck dated January 16, 2024 (Dkt. 916-7)	This exhibit should be partially sealed because it contains Apple's non-public financial information and competitively sensitive information, which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace.
CX-0009.15	Price Committee Deck dated January 16, 2024 (Dkt. 916-7)  MARK A. PERRY ISO APPLE 4	This exhibit should be partially sealed because it contains Apple's non-public financial information and competitively sensitive information, which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace.  CASE No. 4:20-CV-05640-YGR-TSF

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page	•	
	CX-0009.10-A	Price Committee Deck dated January	This exhibit should be partially sealed
3		16, 2024 (redacted)	because it contains Apple's non-public
			financial information and competitively sensitive information, which if publicly
4			disclosed would put Apple at a
5			competitive disadvantage in the
_			marketplace.
6	CX-0009.11-A	Price Committee Deck dated January	This exhibit should be partially sealed
7		16, 2024 (redacted)	because it contains Apple's non-public
			financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
10	CX-0009.13-A	Price Committee Deck dated January	This exhibit should be partially sealed
11		16, 2024 (redacted)	because it contains Apple's non-public
11			financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a
13			competitive disadvantage in the
14	CX-0009.14-A	Dries Committee Dealt dated January	marketplace.
15	CA-0009.14-A	Price Committee Deck dated January 16, 2024 (redacted)	This exhibit should be partially sealed because it contains Apple's non-public
13		10, 2021 (reducted)	financial information and competitively
16			sensitive information, which if publicly
17			disclosed would put Apple at a
17			competitive disadvantage in the
18			marketplace.
.	CX-0009.15-A	Price Committee Deck dated January	This exhibit should be partially sealed
19		16, 2024 (redacted)	because it contains Apple's non-public financial information and competitively
20			sensitive information, which if publicly
			disclosed would put Apple at a
21			competitive disadvantage in the
22			marketplace.
	CX-0014.15	Analysis Group Report (Detailed)	This exhibit should be partially sealed
23			because it contains Apple's non-public
24			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
25			competitive disadvantage in the
26			marketplace.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0014.16	Analysis Group Report (Detailed)	This exhibit should be partially sealed
3			because it contains Apple's non-public
			financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
6	CX-0014.18	Analysis Group Report (Detailed)	This exhibit should be partially sealed
7			because it contains Apple's non-public
			financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
0	CX-0014.21	Analysis Group Report (Detailed)	This exhibit should be partially sealed
$_{1}\parallel$			because it contains Apple's non-public
			financial information and competitively
2			sensitive information, which if publicly
$_3\parallel$			disclosed would put Apple at a
,			competitive disadvantage in the marketplace.
4	CX-0014.22	Analysis Group Report (Detailed)	This exhibit should be partially sealed
5	011 001 1.22	Thiarysis Group Report (Beameu)	because it contains Apple's non-public
			financial information and competitively
6			sensitive information, which if publicly
7			disclosed would put Apple at a
′			competitive disadvantage in the
8	CX-0014.28	Analysis Group Report (Detailed)	marketplace.  This exhibit should be partially sealed
9	CA-0014.26	Analysis Gloup Report (Detailed)	because it contains Apple's non-public
			financial information and competitively
0			sensitive information, which if publicly
$_{1}$			disclosed would put Apple at a
1			competitive disadvantage in the
2	CV 001426	A 1 : C P (D (11)	marketplace.
3	CX-0014.36	Analysis Group Report (Detailed)	This exhibit should be partially sealed because it contains Apple's non-public
ر 			financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a
د			competitive disadvantage in the
6			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE

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1	Exhibit and	Exhibit Description	Basis to Seal
2	Page	-	
3	CX-0014.60	Analysis Group Report (Detailed)	This exhibit should be partially sealed because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6			marketplace.
	CX-0014.61	Analysis Group Report (Detailed)	This exhibit should be partially sealed because it contains Apple's non-public
7			financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
10	CX-0014.63	Analysis Group Report (Detailed)	This exhibit should be partially sealed
11			because it contains Apple's non-public
12			financial information and competitively
12			sensitive information, which if publicly disclosed would put Apple at a
13			competitive disadvantage in the
14			marketplace.
	CX-0015.9	Analysis Group Report (Streamlined)	This exhibit should be partially sealed
15			because it contains Apple's non-public financial information and competitively
16			sensitive information, which if publicly
17			disclosed would put Apple at a
17			competitive disadvantage in the
18	CX-0054.20	Price Committee Deck dated January	marketplace. This exhibit should be partially sealed
19	CA-0034.20	11, 2024	because it contains Apple's non-public
20			financial information and competitively sensitive information, which if publicly
21			disclosed would put Apple at a
			competitive disadvantage in the
22	CX-0054.22	Price Committee Deck dated January	marketplace. This exhibit should be partially sealed
23		11, 2024	because it contains Apple's competitively
24			sensitive information, which if publicly
			disclosed would put Apple at a competitive disadvantage in the
25			marketplace.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0054.23	Price Committee Deck dated January	This exhibit should be partially sealed
3		11, 2024	because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6	CV 0054 26	D: C '4 D 1 1 1	marketplace.
7	CX-0054.26	Price Committee Deck dated January 11, 2024	This exhibit should be partially sealed because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
0	CX-0054.27	Price Committee Deck dated January	This exhibit should be partially sealed
.1		11, 2024	because it contains Apple's non-public financial information and competitively
2			sensitive information, which if publicly disclosed would put Apple at a
13			competitive disadvantage in the
14	CX-0054.31	Price Committee Deck dated January	marketplace. This exhibit should be partially sealed
15	CA 003 1.31	11, 2024	because it contains Apple's non-public
6			financial information and competitively sensitive information, which if publicly
7			disclosed would put Apple at a
8			competitive disadvantage in the marketplace.
19	CX-0054.32	Price Committee Deck dated January 11, 2024	This exhibit should be partially sealed because it contains Apple's non-public
		11, 2024	financial information and competitively
20			sensitive information, which if publicly disclosed would put Apple at a
21			competitive disadvantage in the
22	CX-0054.33	Price Committee Deck dated January	marketplace. This exhibit should be partially sealed
23		11, 2024	because it contains Apple's non-public
24			financial information and competitively sensitive information, which if publicly
25			disclosed would put Apple at a competitive disadvantage in the
26			marketplace.

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	Exhibit and Page	Exhibit Description	Basis to Seal
,	CX-0054.35	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public
			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the
			marketplace.
	CX-0054.36	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public financial information and competitively
			sensitive information, which if publicly
			disclosed would put Apple at a
			competitive disadvantage in the
	CX-0054.37	Drice Committee Deals dated January	marketplace.
	CA-0034.3/	Price Committee Deck dated January 11, 2024	This exhibit should be partially sealed because it contains Apple's non-public
		11, 2021	financial information and competitively
			sensitive information, which if publicly
			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
	CX-0054.38	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public
			financial information and competitively
			sensitive information, which if publicly
			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
	CX-0054.42	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public
			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
			competitive disadvantage in the
	CTL 0051 12		marketplace.
	CX-0054.43	Price Committee Deck dated January	This exhibit should be partially sealed because it contains Apple's non-public
		11, 2024	financial information and competitively
			sensitive information, which if publicly
			disclosed would put Apple at a
			competitive disadvantage in the
		1	marketplace.

E	xhibit and Page	Exhibit Description	Basis to Seal
СХ	X-0054.47	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the marketplace.
CX	G-0054.48	Price Committee Deck dated January	This exhibit should be partially sealed
		11, 2024	because it contains Apple's non-public financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the marketplace.
CX	G-0202.1	Notes titled "Dynamite Regroup"	This exhibit should be partially sealed
			because it contains one of Apple's confidential codenames which if public
			disclosed would aid bad actors to obtain access to confidential Apple informatio
СХ	I-0202.2	Notes titled "Dynamite Regroup"	This exhibit should be partially sealed
			because it contains one of Apple's confidential codenames which if public
			disclosed would aid bad actors to obtain access to confidential Apple informatio
CX	X-0216.1	Text messages among K. Vij and M. Thieme with screenshots from	This exhibit should be partially sealed because it contains personal information
		presentations titled: "Alternative	of Apple employees.
		Payments With Commission"; "Alternative Payments With	
		Commission"; "Alternative Payments With Commission (Global)"	
СХ	X-0216.8	Text messages among K. Vij and M. Thieme with screenshots from	This exhibit should be partially sealed because it contains Apple's non-public
		presentations titled: "Alternative	financial information and competitively
		Payments With Commission"; "Alternative Payments With	sensitive information, which if publicly disclosed would put Apple at a
		Commission"; "Alternative Payments With Commission (Global)"	competitive disadvantage in the marketplace.
CX	X-0216.11	Text messages among K. Vij and M. Thieme with screenshots from	This exhibit should be partially sealed
		presentations titled: "Alternative	because it contains Apple's non-public financial information and competitively
		Payments With Commission"; "Alternative Payments With	sensitive information, which if publicly disclosed would put Apple at a
		Commission"; "Alternative Payments With Commission (Global)"	competitive disadvantage in the marketplace.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0216.12	Text messages among K. Vij and M.	This exhibit should be partially sealed
3		Thieme with screenshots from presentations titled: "Alternative	because it contains Apple's non-public financial information and competitively
4		Payments With Commission";	sensitive information, which if publicly
		"Alternative Payments With	disclosed would put Apple at a
5		Commission"; "Alternative Payments With Commission (Global)"	competitive disadvantage in the marketplace.
6	CX-0216.13	Text messages among K. Vij and M.	This exhibit should be partially sealed
7		Thieme with screenshots from	because it contains Apple's non-public
		presentations titled: "Alternative	financial information and competitively
8		Payments With Commission"; "Alternative Payments With	sensitive information, which if publicly disclosed would put Apple at a
9		Commission"; "Alternative Payments	competitive disadvantage in the
10		With Commission (Global)"	marketplace.
	CX-0223.1	Email from S. Cameron to P. Schiller et al re "Wisconsin Deck – Review for	This exhibit should be partially sealed because it contains personal information
11		Tim Meeting on 6/20" attaching	of Apple employees.
12		presentation titled "Epic Injunction	
13	CX-0223.7	Implementation Proposal" Email from S. Cameron to P. Schiller	This avhibit should be portially souled
	CA-0223.7	et al re "Wisconsin Deck – Review for	This exhibit should be partially sealed because it contains one of Apple's
14		Tim Meeting on 6/20" attaching	confidential codenames which if publicly
15		presentation titled "Epic Injunction	disclosed would aid bad actors to obtain
16	CX-0223.15	Implementation Proposal"  Email from S. Cameron to P. Schiller	access to confidential Apple information.  This exhibit should be partially sealed
	0223.13	et al re "Wisconsin Deck – Review for	because it contains Apple's non-public
17		Tim Meeting on 6/20" attaching	financial information and competitively
18		presentation titled "Epic Injunction Implementation Proposal"	sensitive information, which if publicly disclosed would put Apple at a
19		Implementation Proposal	competitive disadvantage in the
			marketplace and aid a bad actor in
20			obtaining commercially sensitive information.
21	CX-0223.29	Email from S. Cameron to P. Schiller	This exhibit should be partially sealed
22		et al re "Wisconsin Deck – Review for	because it contains Apple's non-public
		Tim Meeting on 6/20" attaching	financial information and competitively
23		presentation titled "Epic Injunction Implementation Proposal"	sensitive information, which if publicly disclosed would put Apple at a
24		Implementation i roposar	competitive disadvantage in the
25			marketplace.
26			

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0223.30	Email from S. Cameron to P. Schiller	This exhibit should be partially sealed
3	C/I 0223.30	et al re "Wisconsin Deck – Review for Tim Meeting on 6/20" attaching	because it contains Apple's non-public financial information and competitively
4		presentation titled "Epic Injunction	sensitive information, which if publicly
5		Implementation Proposal"	disclosed would put Apple at a competitive disadvantage in the
6	CX-0223.34	Email from S. Cameron to P. Schiller	marketplace. This exhibit should be partially sealed
7	CA-0223.34	et al re "Wisconsin Deck – Review for Tim Meeting on 6/20" attaching	because it contains Apple's non-public
8		presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
9		Implementation Proposal"	disclosed would put Apple at a competitive disadvantage in the
10	CX-0223.35	Email from S. Cameron to P. Schiller	marketplace. This exhibit should be partially sealed
11	CA-0223.33	et al re "Wisconsin Deck – Review for	because it contains Apple's non-public
12		Tim Meeting on 6/20" attaching presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
13		Implementation Proposal"	disclosed would put Apple at a competitive disadvantage in the
14	CX-0223.39	Fara 1 form C. Common to D. Calvillan	marketplace.
15	CX-0223.39	Email from S. Cameron to P. Schiller et al re "Wisconsin Deck – Review for	This exhibit should be partially sealed because it contains Apple's non-public
16		Tim Meeting on 6/20" attaching presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
17		Implementation Proposal"	disclosed would put Apple at a competitive disadvantage in the
18	GYL 0222 40		marketplace.
19	CX-0223.40	Email from S. Cameron to P. Schiller et al re "Wisconsin Deck – Review for	This exhibit should be partially sealed because it contains Apple's non-public
20		Tim Meeting on 6/20" attaching presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
21		Implementation Proposal"	disclosed would put Apple at a competitive disadvantage in the
22	CX 0224 1	F 16 0.0	marketplace.
23	CX-0224.1	Email from S. Cameron attaching a presentation with notes titled "Epic	This exhibit should be partially sealed because it contains personal information
24	CX-0224.7	Injunction Implementation"  Email from S. Cameron attaching a	of Apple employees.  This exhibit should be partially sealed
	CA-0227.1	presentation with notes titled "Epic	because it contains one of Apple's
25		Injunction Implementation"	confidential codenames which if publicly disclosed would aid bad actors to obtain
26			access to confidential Apple information.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0224.15	Email from S. Cameron attaching a	This exhibit should be partially sealed
3	CA-0224.13	presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the marketplace.
6	CX-0224.16	Email from S. Cameron attaching a	This exhibit should be partially sealed
7		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and private
8			information concerning third parties or concerning the business of third parties,
9			which if revealed would put Apple and
10			third parties at a competitive disadvantage in the marketplace.
11	CX-0224.30	Email from S. Cameron attaching a	This exhibit should be partially sealed
12		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a
14			competitive disadvantage in the marketplace.
15	CX-0224.31	Email from S. Cameron attaching a	This exhibit should be partially sealed
16		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and competitively
17			sensitive information, which if publicly
			disclosed would put Apple at a competitive disadvantage in the
18			marketplace.
19	CX-0224.33	Email from S. Cameron attaching a	This exhibit should be partially sealed
20		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and competitively
21			sensitive information, which if publicly disclosed would put Apple at a
22			competitive disadvantage in the
23	CX-0224.34	Email from S. Cameron attaching a	marketplace. This exhibit should be partially sealed
	011 0227.37	presentation with notes titled "Epic	because it contains Apple's non-public
24		Injunction Implementation"	financial information and competitively
25			sensitive information, which if publicly disclosed would put Apple at a
26			competitive disadvantage in the
			marketplace.
27			

1	Exhibit and		
	Page	Exhibit Description	Basis to Seal
2 3	CX-0224.38	Email from S. Cameron attaching a presentation with notes titled "Epic	This exhibit should be partially sealed because it contains Apple's non-public
4		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the marketplace.
6	CX-0224.39	Email from S. Cameron attaching a	This exhibit should be partially sealed
7		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the marketplace.
10	CX-0224.41	Email from S. Cameron attaching a	This exhibit should be partially sealed because it contains Apple's non-public
11		presentation with notes titled "Epic Injunction Implementation"	financial information and competitively
12			sensitive information, which if publicly disclosed would put Apple at a
13			competitive disadvantage in the
14	CX-0224.42	Email from S. Cameron attaching a	marketplace.  This exhibit should be partially sealed
15	0224.42	presentation with notes titled "Epic	because it contains Apple's non-public
16		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
17			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
18	CX-0224.54	Email from S. Cameron attaching a	This exhibit should be partially sealed
19		presentation with notes titled "Epic Injunction Implementation"	because it contains one of Apple's confidential codenames which if publicly
20			disclosed would aid bad actors to obtain
21	CX-0224.57	Email from S. Cameron attaching a	access to confidential Apple information.  This exhibit should be partially sealed
22		presentation with notes titled "Epic	because it contains Apple's non-public
23		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
24			disclosed would put Apple at a
25			competitive disadvantage in the marketplace.
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26			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0224.58	Email from S. Cameron attaching a	This exhibit should be partially sealed
3		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
			marketplace.
6	CX-0224.61	Email from S. Cameron attaching a	This exhibit should be partially sealed
7 II		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information, competitively
8			sensitive information, and an internal
9			codename which if publicly disclosed would put Apple at a competitive
			disadvantage in the marketplace and aid
10			bad actors to obtain access to confidential
11			Apple information.
	CX-0224.64	Email from S. Cameron attaching a	This exhibit should be partially sealed
12		presentation with notes titled "Epic	because it contains Apple's non-public
13		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
14			competitive disadvantage in the
15			marketplace.
	CX-0224.65	Email from S. Cameron attaching a	This exhibit should be partially sealed
16		presentation with notes titled "Epic	because it contains Apple's non-public
17		Injunction Implementation"	financial information and competitively
4.0			sensitive information, which if publicly disclosed would put Apple at a
18			competitive disadvantage in the
19			marketplace.
•	CX-0224.66	Email from S. Cameron attaching a	This exhibit should be partially sealed
20		presentation with notes titled "Epic	because it contains Apple's non-public
21		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
22			disclosed would put Apple at a
22			competitive disadvantage in the
23			marketplace.
_	CX-0224.67	Email from S. Cameron attaching a	This exhibit should be partially sealed
24		presentation with notes titled "Epic	because it contains Apple's non-public
25		Injunction Implementation"	financial information and competitively
26			sensitive information, which if publicly disclosed would put Apple at a
26			competitive disadvantage in the
27			marketplace.
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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0224.69	Email from S. Cameron attaching a	This exhibit should be partially sealed
3		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
6	CX-0224.70	Email from S. Cameron attaching a	This exhibit should be partially sealed
7		presentation with notes titled "Epic	because it contains Apple's non-public
, I		Injunction Implementation"	financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
10	CX-0224.72	Email from S. Cameron attaching a	This exhibit should be partially sealed
11		presentation with notes titled "Epic	because it contains Apple's non-public
11		Injunction Implementation"	financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a
13			competitive disadvantage in the marketplace.
14	CX-0224.73	Email from S. Cameron attaching a	This exhibit should be partially sealed
15	0221.73	presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
16			sensitive information, which if publicly
17			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
18	CX-0224.74	Email from S. Cameron attaching a	This exhibit should be partially sealed
19		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
22	CX-0224.76	Email from S. Cameron attaching a	This exhibit should be partially sealed
23		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
24			sensitive information, which if publicly
25			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
26			marketplace.

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1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0224.77	Email from S. Cameron attaching a	This exhibit should be partially sealed
	CA-0224.77	presentation with notes titled "Epic	because it contains Apple's non-public
3		Injunction Implementation"	financial information and competitively
4		J I	sensitive information, which if publicly
_			disclosed would put Apple at a
5			competitive disadvantage in the
6	CX-0224.78	Email from S. Camaran attaching a	marketplace. This exhibit should be partially sealed
<u>,  </u>	CA-0224.76	Email from S. Cameron attaching a presentation with notes titled "Epic	because it contains Apple's non-public
7		Injunction Implementation"	financial information and competitively
8			sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-0224.79	Email from S. Cameron attaching a	marketplace. This exhibit should be partially sealed
11	CA 0224.79	presentation with notes titled "Epic	because it contains Apple's non-public
11		Injunction Implementation"	financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
14	CX-0224.80	Email from S. Cameron attaching a	This exhibit should be partially sealed
15		presentation with notes titled "Epic	because it contains Apple's non-public
1.6		Injunction Implementation"	financial information and competitively
16			sensitive information, which if publicly
17			disclosed would put Apple at a competitive disadvantage in the
10			marketplace.
18	CX-0224.83	Email from S. Cameron attaching a	This exhibit should be partially sealed
19		presentation with notes titled "Epic	because it contains Apple's non-public
20		Injunction Implementation"	financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
21			competitive disadvantage in the
22			marketplace.
	CX-0224.84	Email from S. Cameron attaching a	This exhibit should be partially sealed
23		presentation with notes titled "Epic	because it contains Apple's non-public
24		Injunction Implementation"	financial information and competitively sensitive information, which if publicly
م.			disclosed would put Apple at a
25			competitive disadvantage in the
26			marketplace.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0224.86	Email from S. Cameron attaching a	This exhibit should be partially sealed
3		presentation with notes titled "Epic	because it contains Apple's non-public
		Injunction Implementation"	financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6			marketplace.
6	CX-0224.87	Email from S. Cameron attaching a	This exhibit should be partially sealed
7		presentation with notes titled "Epic Injunction Implementation"	because it contains Apple's non-public financial information and private
8			information relating to third parties or
9			concerning the business of third parties, which if revealed would put Apple and
			third parties at a competitive
10			disadvantage in the marketplace.
11	CX-0225.1	Email from S. Cameron to T. Cook re	This exhibit should be partially sealed
12		"Epic injunction – consumer warning	because it contains personal information
12		revision" attaching presentation titled "[CONFIDENTIAL	of Apple employees.
13		CODENAME]/Wisconsin Sheet –	
14		Copy Update"	
	CX-0225.2	Email from S. Cameron to T. Cook re	This exhibit should be partially sealed
15		"Epic injunction – consumer warning revision" attaching presentation titled	because it contains one of Apple's confidential codenames which if publicly
16		"[CONFIDENTIAL	disclosed would aid bad actors to obtain
17		CODENAME]/Wisconsin Sheet –	access to confidential Apple information.
17		Copy Update"	
18	CX-0227.10	Presentation titled "App Store Price Committee – U.S Linked	This exhibit should be partially sealed because it contains Apple's non-public
19		Transactions"	financial information and competitively
20			sensitive information, which if publicly
20			disclosed would put Apple at a competitive disadvantage in the
21			marketplace.
22	CX-0227.11	Presentation titled "App Store Price	This exhibit should be partially sealed
		Committee – U.S Linked	because it contains Apple's non-public
23		Transactions"	financial information and competitively
24			sensitive information, which if publicly disclosed would put Apple at a
25			competitive disadvantage in the
25			marketplace.
26			

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0227.12	Presentation titled "App Store Price	This exhibit should be partially sealed
3		Committee – U.S Linked Transactions"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6	CX-0227.16	Dungantation titled "Ann Stone Duice	marketplace.
7	CX-0227.16	Presentation titled "App Store Price Committee – U.S Linked	This exhibit should be partially sealed because it contains Apple's non-public
8		Transactions"	financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the marketplace.
10	CX-0227.17	Presentation titled "App Store Price	This exhibit should be partially sealed
11		Committee – U.S Linked Transactions"	because it contains Apple's non-public financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14	CX-0227.18	Durantski su tidla 1 % A su Ctara Diia	marketplace.
15	CX-0227.18	Presentation titled "App Store Price Committee – U.S Linked	This exhibit should be partially sealed because it contains Apple's non-public
16		Transactions"	financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
17			competitive disadvantage in the marketplace.
18	CX-0227.21	Presentation titled "App Store Price	This exhibit should be partially sealed
19		Committee – U.S Linked Transactions"	because it contains Apple's non-public financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a competitive disadvantage in the
22	CX-0227.22	D (1) 1/1 1/4 C( D'	marketplace.
23	CX-0227.22	Presentation titled "App Store Price Committee – U.S Linked	This exhibit should be partially sealed because it contains Apple's non-public
24		Transactions"	financial information and competitively
25			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the marketplace.
26			паткстріасс.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0227.23	Presentation titled "App Store Price	This exhibit should be partially sealed
3		Committee – U.S Linked	because it contains Apple's non-public
		Transactions"	financial information and competitively sensitive information, which if publicly
4			disclosed would put Apple at a
5			competitive disadvantage in the
6	CX-0227.24	Presentation titled "App Store Price	marketplace. This exhibit should be partially sealed
7	CA 0227.24	Committee – U.S Linked	because it contains Apple's non-public
		Transactions"	financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the
10			marketplace.
	CX-0227.27	Presentation titled "App Store Price Committee – U.S Linked	This exhibit should be partially sealed because it contains Apple's non-public
11		Transactions"	financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14			marketplace.
	CX-0229.1 to	Email from P. Schiller to J. Brown et	This exhibit should be partially sealed
15	CX-0229.2	al re "Wisconsin Plans"	because it contains Apple's personal identifying information of individuals
16			affiliated with Apple and a link to an
17			confidential Apple document which if
			publicly disclosed would aid bad actors to obtain access to confidential Apple
18			information.
19	CX-0231.5	Presentation titled "Existing Programs	This exhibit should be partially sealed
20		and Exceptions"	because it contains Apple's non-public financial information and competitively
			sensitive information, which if publicly
21			disclosed would put Apple at a
22			competitive disadvantage in the marketplace.
23	CX-0231.6	Presentation titled "Existing Programs	This exhibit should be partially sealed
24		and Exceptions"	because it contains Apple's non-public
			financial information and competitively sensitive information, which if publicly
25			disclosed would put Apple at a
26			competitive disadvantage in the
27			marketplace.

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$1 \mid$	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0231.7	Presentation titled "Existing Programs	This exhibit should be partially sealed
3		and Exceptions"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6			marketplace.
7	CX-0231.8	Presentation titled "Existing Programs and Exceptions"	This exhibit should be partially sealed because it contains Apple's non-public
			financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-0231.9	Presentation titled "Existing Programs	marketplace. This exhibit should be partially sealed
11	011 020119	and Exceptions"	because it contains Apple's non-public
12			financial information and competitively sensitive information, which if publicly
13			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
14	CX-0231.11	Presentation titled "Existing Programs	This exhibit should be partially sealed
15		and Exceptions"	because it contains Apple's competitively sensitive information, which if publicly
16			disclosed would put Apple at a
17			competitive disadvantage in the marketplace.
18	CX-0231.13	Presentation titled "Existing Programs and Exceptions"	This exhibit should be partially sealed
19		and exceptions	because it contains Apple's non-public financial information and competitively
20			sensitive information, which if publicly disclosed would put Apple at a
21			competitive disadvantage in the
	CX-0231.14	Presentation titled "Existing Programs	marketplace. This exhibit should be partially sealed
22	CA 0231.17	and Exceptions"	because it contains Apple's non-public
23			financial information and competitively sensitive information, which if publicly
24			disclosed would put Apple at a
25			competitive disadvantage in the marketplace. Additionally, the slide
26			reflects Apple's financial information
27			concerning a third party.
27			concerning a third party.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0231.15	Presentation titled "Existing Programs	This exhibit should be partially sealed
3		and Exceptions"	because it contains Apple's non-public
			financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6			marketplace. Additionally, the slide
			reflects Apple's financial information
7	CX-0231.16	Presentation titled "Existing Programs	concerning a third party.  This exhibit should be partially sealed
8		and Exceptions"	because it contains Apple's non-public
			financial information and competitively
9			sensitive information, which if publicly disclosed would put Apple at a
10			competitive disadvantage in the
11			marketplace. Additionally, the slide
10			reflects financial information concerning
12	CX-0231.17	Presentation titled "Existing Programs	several third parties.  This exhibit should be partially sealed
13	0231.17	and Exceptions"	because it contains Apple's non-public
14		-	financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
15			competitive disadvantage in the
16			marketplace. Additionally, the slide
17			reflects financial information concerning
	CX-0231.18	Presentation titled "Existing Programs	a third party.  This exhibit should be partially sealed
18		and Exceptions"	because it contains Apple's non-public
19			financial information and competitively
20			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the
21			marketplace. Additionally, the slide
22			reflects financial information concerning a third party.
23	CX-0231.19	Presentation titled "Existing Programs	This exhibit should be partially sealed
		and Exceptions"	because it contains Apple's non-public
24			financial information and competitively
25			sensitive information, which if publicly disclosed would put Apple at a
26			competitive disadvantage in the
			marketplace. Additionally, the slide
27			reflects financial information concerning a third party.
28		<u>I</u>	

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0231.20	Presentation titled "Existing Programs	This exhibit should be partially sealed
3	0201120	and Exceptions"	because it contains Apple's non-public
3		_	financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace. Additionally, the slide
6			reflects financial information concerning
7			a third party.
0	CX-0231.21	Presentation titled "Existing Programs	This exhibit should be partially sealed
8		and Exceptions"	because it contains Apple's non-public financial information and competitively
9			sensitive information, which if publicly
10			disclosed would put Apple at a
10			competitive disadvantage in the
11			marketplace. Additionally, the slide reflects financial information concerning
12			a third party.
	CX-0231.22	Presentation titled "Existing Programs	This exhibit should be partially sealed
13		and Exceptions"	because it contains Apple's non-public
14			financial information and competitively sensitive information, which if publicly
15			disclosed would put Apple at a
13			competitive disadvantage in the
16			marketplace. Additionally, the slide
17			reflects financial information concerning
	CX-0231.23	Presentation titled "Existing Programs	a third party.  This exhibit should be partially sealed
18	CA-0231.23	and Exceptions"	because it contains Apple's non-public
19		1	financial information and competitively
20			sensitive information, which if publicly
20			disclosed would put Apple at a competitive disadvantage in the
21			marketplace. Additionally, the slide
22			reflects financial information concerning
			several third parties.
23	CX-0231.24	Presentation titled "Existing Programs	This exhibit should be partially sealed
24		and Exceptions"	because it contains Apple's non-public financial information and competitively
25			sensitive information, which if publicly
25			disclosed would put Apple at a
26			competitive disadvantage in the
27			marketplace.

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1	Exhibit and	<b>Exhibit Description</b>	Basis to Seal
2	Page	-	
3	CX-0231.27	Presentation titled "Existing Programs and Exceptions"	This exhibit should be partially sealed because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the marketplace.
6	CX-0231.29	Presentation titled "Existing Programs	This exhibit should be partially sealed
7		and Exceptions"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the marketplace.
10	CX-0231.30	Presentation titled "Existing Programs	This exhibit should be partially sealed
11		and Exceptions"	because it contains Apple's non-public financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14			marketplace. Additionally, the slide
15			reflects financial information concerning several third parties.
	CX-0231.31	Presentation titled "Existing Programs	This exhibit should be partially sealed
16		and Exceptions"	because it contains Apple's non-public financial information and competitively
17			sensitive information, which if publicly disclosed would put Apple at a
18			competitive disadvantage in the
19			marketplace. Additionally, the slide reflects financial information concerning
20			several third parties.
21	CX-0231.32	Presentation titled "Existing Programs and Exceptions"	This exhibit should be partially sealed because it contains Apple's non-public
22			financial information and competitively
23			sensitive information, which if publicly disclosed would put Apple at a
24			competitive disadvantage in the marketplace. Additionally, the slide
			reflects financial information concerning
25			several third parties.
26			

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1	Exhibit and		
	Page	Exhibit Description	Basis to Seal
2	CX-0231.33	Presentation titled "Existing Programs	This exhibit should be partially sealed
3		and Exceptions"	because it contains Apple's non-public
			financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace. Additionally, the slide
6			reflects financial information concerning
7			several third parties.
· /	CX-0231.34	Presentation titled "Existing Programs	This exhibit should be partially sealed
8		and Exceptions"	because it contains Apple's non-public
			financial information and competitively
9			sensitive information, which if publicly
10			disclosed would put Apple at a
			competitive disadvantage in the marketplace. Additionally, the slide
11			reflects financial information concerning
12			several third parties.
	CX-0244.1	Text Messages between M. Goldberg	This exhibit should be partially sealed
13		and H. Smith	because it contains the non-public
14			personally identifiable information of
			Apple employees, specifically in the
15	CV 0244.2	T (M 1 ( M C 11)	form of phone numbers.
16	CX-0244.3	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
		and H. Simui	relations work and staffing that are
17			immaterial to the proceeding.
18	CX-0244.13	Text Messages between M. Goldberg	This exhibit should be partially sealed
10		and H. Smith	because it contains discussions of public
19			relations work, staffing, and personal
20			information (identity of a child) that are
20	CX-0244.33	Taxt Massagas batwaan M. Galdhara	immaterial to the proceeding.
21	CA-0244.33	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains personal information
22		and II. Sillici	(identity of a spouse) that is immaterial
22			to the proceeding.
23	CX-0244.51	Text Messages between M. Goldberg	This exhibit should be partially sealed
24		and H. Smith	because it contains discussions of public
24			relations copy writing work that is
25	CV 0244 52	T	immaterial to the proceeding.
	CX-0244.52	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
26		and 11. Simui	relations copy writing work that is
27			immaterial to the proceeding.
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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0244.53	Text Messages between M. Goldberg	This exhibit should be partially sealed
3		and H. Smith	because it contains discussions of public
			relations copy writing work that is
4	CX-0244.54	Tout Massacas between M. Coldhons	immaterial to the proceeding.
5	[] CA-0244.34	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
		and II. Simen	relations copy writing work that is
6			immaterial to the proceeding.
7	CX-0244.55	Text Messages between M. Goldberg	This exhibit should be partially sealed
		and H. Smith	because it contains discussions of public
8			relations copy writing work that is
9	CX-0244.56	T .M 1 . M C 111	immaterial to the proceeding.
	[[ CX-0244.56	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
10		and II. Sillitii	relations copy writing work that is
11			immaterial to the proceeding.
11	CX-0244.62	Text Messages between M. Goldberg	This exhibit should be partially sealed
12		and H. Smith	because it contains personal information
13			(identity of a spouse and birthday of
13			grandfather) that is immaterial to the
14	CV 0244 (2	T + M C 111	proceeding.
15	CX-0244.63	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains personal information
13		and II. Simui	(personal musings relating to
16			grandfather-child relationship) that is
1.7			immaterial to the proceeding.
17	CX-0244.64	Text Messages between M. Goldberg	This exhibit should be partially sealed
18		and H. Smith	because it contains personal information
10			(personal musings relating to
19			grandfather-child relationship) that is
20	CX-0244.65	Text Messages between M. Goldberg	immaterial to the proceeding.  This exhibit should be partially sealed
	071 02-17.03	and H. Smith	because it contains personal information
21			(personal musings relating to
22			grandfather-child relationship) that is
			immaterial to the proceeding.
23	CX-0244.86	Text Messages between M. Goldberg	This exhibit should be partially sealed
24		and H. Smith	because it contains discussions of public
			relations work and staffing that are immaterial to the proceeding.
25	CX-0244.87	Text Messages between M. Goldberg	This exhibit should be partially sealed
26		and H. Smith	because it contains discussions of public
			relations work, staffing, and personal
27			details that are immaterial to the
28			proceeding.
~			

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0244.88	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
3		and II. Simui	relations work, staffing, and personal
4			details that are immaterial to the proceeding.
5	CX-0244.89	Text Messages between M. Goldberg	This exhibit should be partially sealed
6		and H. Smith	because it contains discussions of public relations work, staffing, and personal
7			details that are immaterial to the proceeding.
8	CX-0244.91	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed
9			because it contains personal details that are immaterial to the proceeding.
10	CX-0244.95	Text Messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains personal details that
11	CV 02461		are immaterial to the proceeding.
12	CX-0246.1	Email from C. Canter to S. Cameron, L. Lew, and J. Cody, copying C.	This exhibit should be partially sealed because it contains financial and other
13		Oliver et al, re "Privileged & Confidential - Fwd: Bumble Inc	private information concerning the business of third parties, which could put
14		Alternative Billing Program Learnings	the third party at a competitive
15		for App Store" attaching presentation titled "Bumble Inc x Alternative	disadvantage in the marketplace, if publicly disclosed. Additionally,
16		Payment Learnings for App Store": "Bumble"	contains personal identifying information of individuals affiliated with Apple
17		Dumoic	which if publicly disclosed would aid bad
18			actors to obtain access to confidential Apple information.
	CX-0246.2	Email from C. Canter to S. Cameron,	This exhibit should be partially sealed
19		L. Lew, and J. Cody, copying C. Oliver et al, re "Privileged &	because it contains financial and other private information concerning the
20		Confidential - Fwd: Bumble Inc Alternative Billing Program Learnings	business of third parties, which could put the third party at a competitive
21		for App Store" attaching presentation	disadvantage in the marketplace, if
22		titled "Bumble Inc x Alternative Payment Learnings for App Store":	publicly disclosed. Additionally, contains personal identifying information
23		"Bumble"	of individuals affiliated with Apple which if publicly disclosed would aid bad
24			actors to obtain access to confidential
25			Apple information.
26			

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0246.3	Email from C. Canter to S. Cameron,	This exhibit should be partially sealed
3		L. Lew, and J. Cody, copying C.	because it contains financial and other
4		Oliver et al, re "Privileged & Confidential - Fwd: Bumble Inc	private information concerning the business of third parties, which could put
4		Alternative Billing Program Learnings	the third party at a competitive
5		for App Store" attaching presentation	disadvantage in the marketplace, if
6		titled "Bumble Inc x Alternative	publicly disclosed. Additionally,
		Payment Learnings for App Store": "Bumble"	contains personal identifying information of individuals affiliated with Apple
7			which if publicly disclosed would aid bad
8			actors to obtain access to confidential
9	CX-0246.4	Email from C. Canter to S. Cameron,	Apple information.  This exhibit should be partially sealed
	0210210.1	L. Lew, and J. Cody, copying C.	because it contains financial and other
10		Oliver et al, re "Privileged &	private information concerning the
11		Confidential - Fwd: Bumble Inc Alternative Billing Program Learnings	business of third parties, which could put the third party at a competitive
12		for App Store" attaching presentation	disadvantage in the marketplace, if
		titled "Bumble Inc x Alternative	publicly disclosed. Additionally,
13		Payment Learnings for App Store":	contains personal identifying information
14		"Bumble"	of individuals affiliated with Apple which if publicly disclosed would aid bad
15			actors to obtain access to confidential
			Apple information.
16	CX-0246.6	Email from C. Canter to S. Cameron, L. Lew, and J. Cody, copying C.	This exhibit should be partially sealed because it contains financial and other
17		Oliver et al, re "Privileged &	private information relating to third
18		Confidential - Fwd: Bumble Inc	parties or concerning the business of
		Alternative Billing Program Learnings	third parties, which could put the third
19		for App Store" attaching presentation titled "Bumble Inc x Alternative	party at a competitive disadvantage in the marketplace, if publicly disclosed.
20		Payment Learnings for App Store":	manie place, il paenely discussion
21	GYL 02460	"Bumble"	
	CX-0246.8 to CX-0246.12	Email from C. Canter to S. Cameron, L. Lew, and J. Cody, copying C.	This exhibit should be partially sealed because it contains financial and other
22	CA-0240.12	Oliver et al, re "Privileged &	private information relating to third
23		Confidential - Fwd: Bumble Inc	parties or concerning the business of
24		Alternative Billing Program Learnings	third parties, which could put the third
		for App Store" attaching presentation titled "Bumble Inc x Alternative	party at a competitive disadvantage in the marketplace, if publicly disclosed.
25		Payment Learnings for App Store":	1 , F 1
26		"Bumble"	

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

27

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0246.14 to	Email from C. Canter to S. Cameron,	This exhibit should be partially sealed because it contains financial and other
3	CX-0246.17	L. Lew, and J. Cody, copying C. Oliver et al, re "Privileged &	private information relating to third
4		Confidential - Fwd: Bumble Inc Alternative Billing Program Learnings	parties or concerning the business of third parties, which could put the third
5		for App Store" attaching presentation titled "Bumble Inc x Alternative	party at a competitive disadvantage in the marketplace, if publicly disclosed.
6		Payment Learnings for App Store":	marketplace, if publicly disclosed.
7	CX-0257.1	"Bumble" Text messages between M. Goldberg	This exhibit should be partially sealed
8	CA-0237.1	and H. Smith	because it contains the non-public
9			personally identifiable information of Apple employees, specifically in the
			form of phone numbers.
10	CX-0257.9	Text messages between M. Goldberg	This exhibit should be partially sealed
11		and H. Smith	because it contains personal details that are immaterial to the proceeding.
12	CX-0257.10	Text messages between M. Goldberg	This exhibit should be partially sealed
13		and H. Smith	because it contains personal details that are immaterial to the proceeding.
14	CX-0257.11	Text messages between M. Goldberg	This exhibit should be partially sealed
		and H. Smith	because it contains discussions of public
15			relations work, staffing, and personal details that are immaterial to the
16			proceeding.
17	CX-0257.26	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
18		and II. Silintii	relations work and staffing details that
	GY 0257 27	T	are immaterial to the proceeding.
19	CX-0257.27	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
20			relations work and staffing details that
21	CX-0257.28	Text messages between M. Goldberg	are immaterial to the proceeding.  This exhibit should be partially sealed
22	CA 0257.20	and H. Smith	because it contains discussions of public
23			relations work and staffing details that are immaterial to the proceeding.
	CX-0257.29	Text messages between M. Goldberg	This exhibit should be partially sealed
24		and H. Smith	because it contains discussions of public
25			relations work and staffing details that are immaterial to the proceeding.
26	CX-0257.30	Text messages between M. Goldberg	This exhibit should be partially sealed
27		and H. Smith	because it contains discussions of public relations work and staffing details that
			are immaterial to the proceeding.
28			

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0257.35	Text messages between M. Goldberg	This exhibit should be partially sealed
3		and H. Smith	because it contains discussions of public relations work and staffing details that
4	GV 0257 26	T	are immaterial to the proceeding.
5	CX-0257.36	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public relations work and staffing details that
6			are immaterial to the proceeding.
7	CX-0257.37	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
8			relations work and staffing details that are immaterial to the proceeding.
9	CX-0257.39	Text messages between M. Goldberg	This exhibit should be partially sealed
10		and H. Smith	because it contains personal details that are immaterial to the proceeding.
11	CX-0257.48	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains personal details that
12			are immaterial to the proceeding.
13	CX-0257.56	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
14 15			relations work, business travel, and personal details that are immaterial to the proceeding.
16	CX-0257.57	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
17			relations work, business travel, and personal details that are immaterial to the
18	CX-0257.58	Tout mass as hotered M. Caldhaus	proceeding.
19	CA-0237.38	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
20			relations work, business travel, and personal details that are immaterial to the
21	CX-0257.59	Text messages between M. Goldberg	proceeding. This exhibit should be partially sealed
22		and H. Smith	because it contains discussions of public relations work, business travel, and
23			personal details that are immaterial to the proceeding.
24	CX-0257.60	Text messages between M. Goldberg	This exhibit should be partially sealed
25		and H. Smith	because it contains discussions of public relations work, business travel, and
26			personal details that are immaterial to the proceeding.
27			harania.

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page	•	
_	CX-0257.61	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed
3		and H. Smith	because it contains discussions of public relations work, business travel, and
4			personal details that are immaterial to the
			proceeding.
5	CX-0257.62	Text messages between M. Goldberg	This exhibit should be partially sealed
6		and H. Smith	because it contains discussions of public
			relations work, business travel, and
7			personal details that are immaterial to the proceeding.
8	CX-0257.63	Text messages between M. Goldberg	This exhibit should be partially sealed
		and H. Smith	because it contains discussions of public
9			relations work, business travel, and
10			personal details that are immaterial to the
	CX-0257.64	Toyt magagaga betyyeen M. Calilland	proceeding.  This aybibit should be partially souled.
11	[] CA-025/.04	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
12		and H. Simui	relations work, business travel, and
			personal details that are immaterial to the
13			proceeding.
14	CX-0257.65	Text messages between M. Goldberg	This exhibit should be partially sealed
		and H. Smith	because it contains discussions of public
15			relations work, business travel, and personal details that are immaterial to the
16			proceeding.
17	CX-0257.66	Text messages between M. Goldberg	This exhibit should be partially sealed
17		and H. Smith	because it contains discussions of public
18			relations work, business travel, and
19			personal details that are immaterial to the proceeding.
1)	CX-0257.67	Text messages between M. Goldberg	This exhibit should be partially sealed
20		and H. Smith	because it contains discussions of public
21			relations work, business travel, and
			personal details that are immaterial to the
22	CX-0257.68	Text messages between M. Goldberg	proceeding. This exhibit should be partially sealed
23	CA-0237.08	and H. Smith	because it contains discussions of public
			relations work, business travel, and
24			personal details that are immaterial to the
25	CN 0255 (C		proceeding.
	CX-0257.69	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed
26		and 11. Simui	because it contains discussions of public relations work, business travel, and
27			personal details that are immaterial to the
<u>,</u>			proceeding.
28		•	·

1	Exhibit and		
1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0257.70	Text messages between M. Goldberg	This exhibit should be partially sealed
3		and H. Smith	because it contains discussions of public relations work, business travel, and
4			personal details that are immaterial to the
			proceeding.
5	CX-0257.71	Text messages between M. Goldberg	This exhibit should be partially sealed
6		and H. Smith	because it contains discussions of public relations work, business travel, and
7			personal details that are immaterial to the
			proceeding.
8	CX-0257.72	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed
9		and H. Smith	because it contains discussions of public relations work, business travel, and
10			personal details that are immaterial to the
	GV 0255 52	T 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	proceeding.
11	CX-0257.73	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
12		and II. Simui	relations work, business travel, and
13			personal details that are immaterial to the
13	CX-0257.74	Taut wasses and between M. Caldhaus	proceeding.
14	[ CA-0237.74	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
15			relations work, business travel, and
16			personal details that are immaterial to the
10	CX-0257.75	Text messages between M. Goldberg	proceeding. This exhibit should be partially sealed
17	011 0237.73	and H. Smith	because it contains discussions of public
18			relations work, business travel, and
19			personal details that are immaterial to the proceeding.
19	CX-0257.76	Text messages between M. Goldberg	This exhibit should be partially sealed
20		and H. Smith	because it contains discussions of public
21			relations work, business travel, and
22			personal details that are immaterial to the proceeding.
	CX-0257.77	Text messages between M. Goldberg	This exhibit should be partially sealed
23		and H. Smith	because it contains discussions of public
24			relations work, business travel, and personal details that are immaterial to the
25			proceeding.
	CX-0257.78	Text messages between M. Goldberg	This exhibit should be partially sealed
26		and H. Smith	because it contains discussions of public
27			relations work, business travel, and personal details that are immaterial to the
20			proceeding.
28			

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0257.79	-	
	CX-0257.79	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
3		and II. Simui	relations work, business travel, and
4			personal details that are immaterial to the
			proceeding.
5	CX-0257.80	Text messages between M. Goldberg	This exhibit should be partially sealed
6		and H. Smith	because it contains discussions of public
			relations work, business travel, and
7			personal details that are immaterial to the proceeding.
8	CX-0257.81	Text messages between M. Goldberg	This exhibit should be partially sealed
	011 020 7 10 1	and H. Smith	because it contains discussions of public
9			relations work, business travel, and
10			personal details that are immaterial to the
	GY 0255 02	T	proceeding.
11	CX-0257.82	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed
12		and H. Smith	because it contains discussions of public relations work, business travel, and
			personal details that are immaterial to the
13			proceeding.
14	CX-0257.83	Text messages between M. Goldberg	This exhibit should be partially sealed
•		and H. Smith	because it contains discussions of public
15			relations work, business travel, and
16			personal details that are immaterial to the proceeding.
	CX-0257.84	Text messages between M. Goldberg	This exhibit should be partially sealed
17	011 020 710 1	and H. Smith	because it contains discussions of public
18			relations work, business travel, and
			personal details that are immaterial to the
19	GY 0257 05	T	proceeding.
20	CX-0257.85	Text messages between M. Goldberg and H. Smith	This exhibit should be partially sealed because it contains discussions of public
		and 11. Simui	relations work, business travel, and
21			personal details that are immaterial to the
22			proceeding.
	CX-0257.86	Text messages between M. Goldberg	This exhibit should be partially sealed
23		and H. Smith	because it contains discussions of public
24			relations work, business travel, and
			personal details that are immaterial to the proceeding.
25	CX-0257.87	Text messages between M. Goldberg	This exhibit should be partially sealed
26		and H. Smith	because it contains discussions of public
			relations work, business travel, and
27			personal details that are immaterial to the
28			proceeding.

1	Exhibit and		
	Page	Exhibit Description	Basis to Seal
2	CX-0257.88	Text messages between M. Goldberg	This exhibit should be partially sealed
3		and H. Smith	because it contains discussions of public relations work, business travel, and
4			personal details that are immaterial to the
			proceeding.
5	CX-0264.1	Text messages between K. Vij and N. Barton	This exhibit should be partially sealed because it contains the non-public
6		Barton	personally identifiable information of
7			Apple employees, specifically in the
8			form of phone numbers. This information warrants sealing to protect the
			individuals' privacy.
9	CX-0265.1	Text messages between K. Vij and N.	This exhibit should be partially sealed
10		Barton	because it contains the non-public personally identifiable information of
11			Apple employees, specifically in the
			form of phone numbers. This information
12			warrants sealing to protect the individuals' privacy.
13	CX-0265.12	Text messages between K. Vij and N.	This exhibit should be partially sealed
14		Barton	because it contains Apple's non-public
15			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
16			competitive disadvantage in the
17	CX-0265.16	Text messages between K. Vij and N.	marketplace This exhibit should be partially sealed
18	C11 0203.10	Barton	because it contains Apple's non-public
			financial information and competitively
19			sensitive information, which if publicly disclosed would put Apple at a
20			competitive disadvantage in the
21	CV 0265 17	Tt W. W 1N	marketplace
22	CX-0265.17	Text messages between K. Vij and N. Barton	This exhibit should be partially sealed because it contains a URL to one of
			Apple's resources and one of Apple's
23			confidential codenames which if publicly
24			disclosed would aid bad actors to obtain access to confidential Apple information.
25	CX-0265.18	Text messages between K. Vij and N.	This exhibit should be partially sealed
		Barton	because it contains content protected by
26			attorney-client privilege and work product privilege. The document has
27			been clawed back and reproduced.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Ewhihit and		
1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0265.20	Text messages between K. Vij and N.	This exhibit should be partially sealed
3		Barton	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6	CV 0265 21	Total William I. V. V. and N.	marketplace
7	CX-0265.21	Text messages between K. Vij and N. Barton	This exhibit should be partially sealed because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-0265.26	Text messages between K. Vij and N.	marketplace This exhibit should be partially sealed
11		Barton	because it contains the non-public personally identifiable information of
12			Apple employees, specifically in the
13			form of phone numbers. This information
			warrants sealing to protect the individuals' privacy. It should also be
14			partially sealed because it contains
15			Apple's non-public financial information and competitively sensitive information,
16			which if publicly disclosed would put
17			Apple at a competitive disadvantage in the marketplace
18	CX-0265.27	Text messages between K. Vij and N.	This exhibit should be partially sealed
19		Barton	because it contains the non-public personally identifiable information of
			Apple employees, specifically in the
20			form of phone numbers. This information warrants sealing to protect the
21			individuals' privacy. It should also be partially sealed because it contains
22			Apple's non-public financial information
23			and competitively sensitive information, which if publicly disclosed would put
24			Apple at a competitive disadvantage in the marketplace
25	CX-0265.28	Text messages between K. Vij and N.	This exhibit should be partially sealed
26		Barton	because it contains content protected by
27			attorney-client privilege and work product privilege. The document has
28			been clawed back and reproduced.
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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0265.29	Text messages between K. Vij and N.	This exhibit should be partially sealed
3		Barton	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace
6	CX-0265.30	Text messages between K. Vij and N.	This exhibit should be partially sealed
7		Barton	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a competitive disadvantage in the
10			marketplace
	CX-0265.33	Text messages between K. Vij and N. Barton	This exhibit should be partially sealed because it contains Apple's non-public
11		Burton	financial information and competitively
12			sensitive information, which if publicly disclosed would put Apple at a
13			competitive disadvantage in the
14	CX-0266.1	Email from Sean L. to C. Oliver et al.	marketplace
15	CA-0200.1	re "Alternative Payments in Korea -	This exhibit should be partially sealed because it contains Apple's personal
16		Developer Feedback"	identifying information of individuals
			affiliated with Apple which if publicly disclosed would aid bad actors to obtain
17			access to confidential Apple information.
18	CX-0268.1 to CX-0268.11	Email from M. Gromek to P. Schiller re "HI and Copy Updates" for	This exhibit should be partially sealed because it contains Apple's personal
19		Netherlands dating apps	identifying information of individuals
20			affiliated with Apple which if publicly disclosed would aid bad actors to obtain
21			access to confidential Apple information.
	CX-0268.1	Email from M. Gromek to P. Schiller re "HI and Copy Updates" for	This exhibit should be partially sealed because it contains one of Apple's
22		Netherlands dating apps	confidential codenames which if publicly
23			disclosed would aid bad actors to obtain
24	CX-0268.3	Email from M. Gromek to P. Schiller	access to confidential Apple information.  This exhibit should be partially sealed
25		re "HI and Copy Updates" for	because it contains one of Apple's
26		Netherlands dating apps	confidential codenames which if publicly disclosed would aid bad actors to obtain
			access to confidential Apple information.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0268.5	Email from M. Gromek to P. Schiller	This exhibit should be partially sealed
3		re "HI and Copy Updates" for	because it contains one of Apple's
4		Netherlands dating apps	confidential codenames which if publicly disclosed would aid bad actors to obtain
4			access to confidential Apple information.
5	CX-0268.6	Email from M. Gromek to P. Schiller	This exhibit should be partially sealed
6		re "HI and Copy Updates" for	because it contains one of Apple's
		Netherlands dating apps	confidential codenames which if publicly disclosed would aid bad actors to obtain
7			access to confidential Apple information.
8	CX-0268.7	Email from M. Gromek to P. Schiller	This exhibit should be partially sealed
		re "HI and Copy Updates" for	because it contains one of Apple's
9		Netherlands dating apps	confidential codenames which if publicly
10			disclosed would aid bad actors to obtain
11	CX-0268.10	Email from M. Gromek to P. Schiller	access to confidential Apple information.  This exhibit should be partially sealed
11	0200.10	re "HI and Copy Updates" for	because it contains one of Apple's
12		Netherlands dating apps	confidential codenames which if publicly
13			disclosed would aid bad actors to obtain
13	CX-0268.12	Email from M. Connected D. Catallan	access to confidential Apple information.
14	CX-0268.12	Email from M. Gromek to P. Schiller re "HI and Copy Updates" for	This exhibit should be partially sealed because it contains one of Apple's
15		Netherlands dating apps	confidential codenames which if publicly
		8 11	disclosed would aid bad actors to obtain
16			access to confidential Apple information.
17	CX-0272.7	Presentation titled "Proposed	This exhibit should be partially sealed
4.0		responses to Epic injunction"	because it contains one of Apple's confidential codenames which if publicly
18			disclosed would aid bad actors to obtain
19			access to confidential Apple information.
20	CX-0272.8	Presentation titled "Proposed	This exhibit should be partially sealed
20		responses to Epic injunction"	because it contains Apple's non-public
21			financial information and competitively sensitive information, which if publicly
22			disclosed would put Apple at a
			competitive disadvantage in the
23	GYY 02-2 0		marketplace.
24	CX-0272.9	Presentation titled "Proposed	This exhibit should be partially sealed because it contains Apple's non-public
		responses to Epic injunction"	financial information and competitively
25			sensitive information, which if publicly
26			disclosed would put Apple at a
27			competitive disadvantage in the
41			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0272.10	Presentation titled "Proposed	This exhibit should be partially sealed
,	0272.10	responses to Epic injunction"	because it contains Apple's non-public
3			financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a
,			competitive disadvantage in the marketplace.
6	CX-0272.12	Presentation titled "Proposed	This exhibit should be partially sealed
7	0272.12	responses to Epic injunction"	because it contains one of Apple's
′			confidential codenames which if publicly
8			disclosed would aid bad actors to obtain
9	GV 0272 12	D ::: ::: 1/(D ::: 1	access to confidential Apple information.
	CX-0272.13	Presentation titled "Proposed responses to Epic injunction"	This exhibit should be partially sealed
10		responses to Epic injunction	because it contains Apple's non-public financial information and competitively
11			sensitive information, which if publicly
11			disclosed would put Apple at a
12			competitive disadvantage in the
13			marketplace.
13	CX_0272.14	Presentation titled "Proposed	This exhibit should be partially sealed
14		responses to Epic injunction"	because it contains Apple's non-public financial information, competitively
15			sensitive information, and an internal
13			codename which if publicly disclosed
16			would put Apple at a competitive
17			disadvantage in the marketplace and aid
1 /			bad actors to obtain access to confidential
18	CX-0272.16	Presentation titled "Proposed	Apple information.  This exhibit should be partially sealed
19	CA-02/2.10	responses to Epic injunction"	because it contains Apple's non-public
1		Tespenses to Epic injunetion	financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a
21			competitive disadvantage in the
22	CX-0272.18	Presentation titled "Proposed	marketplace.  This exhibit should be partially sealed
23	CA-02/2.16	responses to Epic injunction"	because it contains Apple's non-public
		responses to tiple injunction	financial information and competitively
24			sensitive information, which if publicly
25			disclosed would put Apple at a
			competitive disadvantage in the
26			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0272.19	Presentation titled "Proposed	This exhibit should be partially sealed
3		responses to Epic injunction"	because it contains Apple's non-public financial information, competitively
1    -			sensitive information, and an internal codename which if publicly disclosed
			would put Apple at a competitive disadvantage in the marketplace and aid
5			bad actors to obtain access to confidential Apple information.
7     }	CX-0272.20	Presentation titled "Proposed responses to Epic injunction"	This exhibit should be partially sealed because it contains Apple's non-public
$\  \cdot \ $		responses to Epic injunction	financial information, competitively
			sensitive information, and an internal codename which if publicly disclosed
			would put Apple at a competitive disadvantage in the marketplace and aid
$\lfloor \frac{1}{2} \rfloor$			bad actors to obtain access to confidential Apple information.
	CX-0279.1 to	Email from C. Oliver to S. Cameron	This exhibit should be partially sealed
}     -	CX-0279.2	and P. Schiller et al re "Updated Wisconsin deck for review"	because it contains personal information of Apple employees.
, 	CX-0279.2	Email from C. Oliver to S. Cameron and P. Schiller et al re "Updated	This exhibit should be partially sealed because it contains Apple's non-public
, 		Wisconsin deck for review"	financial information and competitively
$, \parallel$			sensitive information, which if publicly disclosed would put Apple at a
$\left\  {}^{'}_{8}  ight\ $			competitive disadvantage in the marketplace.
9	CX-0281.1	Direct messages among M. Bihai, J. Elman, R. Onak and T. Liu	This exhibit should be partially sealed because it contains personal information
$\left\  \cdot \right\ $			of Apple employees, as well as
			confidential links to Apple's internal meeting sites which could aid a bad
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$			actor in obtaining commercially sensitive information.
3	CX-0281.5	Direct messages among M. Bihai, J. Elman, R. Onak and T. Liu	This exhibit should be partially sealed because it contains two of Apple's
4			confidential codenames which if publicly disclosed would aid bad actors to obtain
5	CV 0201 7	Discourage M. Diff. 1. X	access to confidential Apple information.
<b>5</b>	CX-0281.7	Direct messages among M. Bihai, J. Elman, R. Onak and T. Liu	This exhibit should be partially sealed because it contains two of Apple's
7			confidential codenames which if publicly disclosed would aid bad actors to obtain
			access to confidential Apple information.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0291.13	Presentation with notes titled "Epic	This exhibit should be partially sealed
3	0291.13	Injunction Implementation"	because it contains Apple's non-public
3		2	financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
6	CX-0291.17	Presentation with notes titled "Epic	This exhibit should be partially sealed
7		Injunction Implementation"	because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-0291.18	Presentation with notes titled "Epic	marketplace.  This exhibit should be partially sealed
11	CA-0291.18	Injunction Implementation"	because it contains Apple's non-public
11		3	financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
14	CX-0291.19	Presentation with notes titled "Epic	This exhibit should be partially sealed
15		Injunction Implementation"	because it contains Apple's non-public
16			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
17			competitive disadvantage in the
18	CV 0201 20	D	marketplace.
19	CX-0291.20	Presentation with notes titled "Epic Injunction Implementation"	This exhibit should be partially sealed because it contains Apple's non-public
		injunetion impromentation	financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a competitive disadvantage in the
22			marketplace.
22	CX-0291.21	Presentation with notes titled "Epic	This exhibit should be partially sealed
23		Injunction Implementation"	because it contains Apple's non-public
24			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
25			competitive disadvantage in the
26			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL

HEARING EXS.

Exhibit and Page	Exhibit Description	Basis to Seal
CX-0291.22	Presentation with notes titled "Epic Injunction Implementation"	This exhibit should be partially sealed because it contains Apple's non-public
		financial information and competitively sensitive information, which if publicly
		disclosed would put Apple at a competitive disadvantage in the
CV 0201 22	D 44' '41 4 4'41 18E'	marketplace.
CX-0291.23	Presentation with notes titled "Epic Injunction Implementation"	This exhibit should be partially sealed because it contains Apple's non-public
		financial information and competitively sensitive information, which if publicly
		disclosed would put Apple at a competitive disadvantage in the
CX-0291.24	Presentation with notes titled "Epic	marketplace. This exhibit should be partially sealed
	Injunction Implementation"	because it contains Apple's non-public financial information and competitively
		sensitive information, which if publicly
		disclosed would put Apple at a competitive disadvantage in the
CX-0384.1 to	Email from L. Pulchny to T.	marketplace. This exhibit should be partially sealed
CX-0384.2	Washburn et al re "Wisconsin Prep for	because it contains Apple's personal
	6/28 Tim Mtg. Actions"	identifying information of individuals affiliated with Apple which if publicly
		disclosed would aid bad actors to obtain access to confidential Apple information
CX-0435.1	Meeting invitation from K. Vij to C. Oliver et al re "Wisconsin Program's	This exhibit should be partially sealed because it contains personal information
	Slide sync"	of Apple employees, as well as
		confidential links to Apple's internal meeting sites which could aid a bad
		actor in obtaining commercially sensitive information.
CX-0464.1	Text messages among P. Ajemian, H. Smith et al	This exhibit should be partially sealed because it contains personal information
	Simuletal	of Apple employees, as well as
		confidential links to Apple's internal meeting sites which could aid a bad
		actor in obtaining commercially sensitive information.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0464.4,	Text messages among P. Ajemian, H.	This exhibit should be partially sealed
3	CX-0464.6 to CX-0464.14	Smith et al	because it contains personal information of Apple employees, as well as
4			confidential links to Apple's internal meeting sites which could aid a bad
5			actor in obtaining commercially sensitive
6	CX-0478.1,	Email from M. Goldberg to C. Oliver	information.  This exhibit should be partially sealed
7	CX-0478.2, CX-0478.11	et al re Checking in: Wisconsin	because it contains Apple's personal identifying information of individuals
8			affiliated with Apple which if publicly disclosed would aid bad actors to obtain
9			access to confidential Apple information.
10	CX-0478.1	Email from M. Goldberg to C. Oliver et al re Checking in: Wisconsin	This exhibit should be partially sealed because it contains one of Apple's
11			confidential codenames which if publicly disclosed would aid bad actors to obtain
12	G77 0 40 4 4		access to confidential Apple information.
13	CX-0484.1	Email from T. Liu to M. Fischer et al re [Phil Deck] Wisconsin attaching	This exhibit should be partially sealed because it contains personal information
14	CX-0485.1 to	presentation titled "Wisconsin"  Meeting Invitation titled "Epic	of Apple employees.  This exhibit should be partially sealed
15	CX-0485.1 to CX-0485.2	Injunction Implementation"	because it contains personal information of Apple employees, as well as
16			confidential links to Apple's internal
17			meeting sites which could aid a bad actor in obtaining commercially sensitive
18			information.
19	CX-0486.1, CX-0486.3	Email from J. Cheung to P. Velamuri et al re [Notes] Weekly App Store	This exhibit should be partially sealed because it contains Apple's personal
20	011 0 100.5	Roadmap Sync - 12/9	identifying information of individuals
21			affiliated with Apple which if publicly disclosed would aid bad actors to obtain
22	CX-0486.1	Email from J. Cheung to P. Velamuri	access to confidential Apple information.  This exhibit should be partially sealed
23		et al re [Notes] Weekly App Store Roadmap Sync - 12/9	because it contains Apple's competitively sensitive information, which if publicly
24		Roadinap Synt - 12/7	disclosed would put Apple at a
25			competitive disadvantage in the marketplace.
26	CX-0487.1	Direct Message Exchange among A. Savio, D. DuBois et al	This exhibit should be partially sealed because it contains one of Apple's
27		Sarro, D. Dabois et al	confidential codenames which if publicly disclosed would aid bad actors to obtain
28			access to confidential Apple information.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

Exhibit and Page	Exhibit Description	Basis to Seal
CX-0487.4	Direct Message Exchange among A.	This exhibit should be partially sealed
	Savio, D. DuBois et al	because it contains personal information
		of Apple employees, confidential links to
		Apple's internal meeting sites, and two of
		Apple's confidential codenames which if publicly disclosed would aid bad actors
		to obtain access to confidential Apple
		information.
CX-0487.5	Direct Message Exchange among A.	This exhibit should be partially sealed
	Savio, D. DuBois et al	because it contains personal information
		of Apple employees, confidential links to
		Apple's internal meeting sites, and two of
		Apple's confidential codenames, which
		could aid a bad actor in obtaining
CN 0407 C	D' AM E 1	commercially sensitive information.
CX-0487.6	Direct Message Exchange among A. Savio, D. DuBois et al	This exhibit should be partially sealed because it contains two of Apple's
	Savio, D. Dubois et al	confidential codenames which if publicly
		disclosed would aid bad actors to obtain
		access to confidential Apple information.
CX-0487.7	Direct Message Exchange among A.	This exhibit should be partially sealed
	Savio, D. DuBois et al	because it contains two of Apple's
		confidential codenames which if publicly
		disclosed would aid bad actors to obtain
		access to confidential Apple information.
CX-0487.8	Direct Message Exchange among A.	This exhibit should be partially sealed
	Savio, D. DuBois et al	because it contains two of Apple's
		confidential codenames which if publicly
		disclosed would aid bad actors to obtain access to confidential Apple information.
CX-0488.1 to	Meeting Invitation titled "Wisconsin	This exhibit should be partially sealed
CX-0488.2	Business Update"	because it contains personal information
2.1 0.00.2	2 ismess openie	of Apple employees, as well as
		confidential links to Apple's internal
		meeting sites which could aid a bad
		actor in obtaining commercially sensitive
		information.
CX-0489.1 to	Email from C. Jones to V. Vu re	This exhibit should be partially sealed
CX-0489.2	Adding Key Stakeholders - Epic	because it contains Apple's personal
	Injunction	identifying information of individuals
		affiliated with Apple which if publicly
		disclosed would aid bad actors to obtain
		access to confidential Apple information.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

$1 \parallel$	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0490.1 to	Email from A. Hawthorne to K. Vij et	This exhibit should be partially sealed
3	CX-0490.5	al re Wisconsin - Financials Follow-	because it contains Apple's personal
		Up	identifying information of individuals
4			affiliated with Apple which if publicly disclosed would aid bad actors to obtain
5			access to confidential Apple information.
	CX-0496.1 to	Text Messages among T. Liu, M.	This exhibit should be partially sealed
6	CX-0496.3	Gromek et al	because it contains personal information
7			of Apple employees, confidential links to
8			Apple's internal meeting sites, and Apple's confidential codenames which
8			could aid a bad actor in obtaining
9			commercially sensitive information.
10	CX-0499.1	Text Messages among C. Oliver, A.	This exhibit should be partially sealed
		Thai, and S. Cameron	because it contains personal information
11			of Apple employees, as well as confidential links to Apple's internal
12			meeting sites which could aid a bad
,			actor in obtaining commercially sensitive
13	CY1 0 500 1		information.
14	CX-0503.1	Text Messages among C. Oliver, M. Fischer, and N. Barton	This exhibit should be partially sealed because it contains personal information
15		Prischer, and N. Barton	of Apple employees, as well as
			confidential links to Apple's internal
16			meeting sites which could aid a bad
<sub>17</sub>			actor in obtaining commercially sensitive
	CX-0505.1 to	Email from T. Washburn to M.	information. This exhibit should be partially sealed
18	CX-505.2	Fischer et al re "Updated Wisconsin	because it contains Apple's personal
19		Deck for 6/28" attaching presentation	identifying information of individuals
20		titled "Epic Injunction	affiliated with Apple and a link to
20		Implementation"	Apple's internal documents which if publicly disclosed would aid bad actors
21			to obtain access to confidential Apple
22			information.
	CX-0505.16	Email from T. Washburn to M.	This exhibit should be partially sealed
23		Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
24		Deck for 6/28" attaching presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
		Implementation"	disclosed would put Apple at a
25		•	competitive disadvantage in the
11	1		marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-0505.20	Email from T. Washburn to M.	This exhibit should be partially sealed
3		Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
3		Deck for 6/28" attaching presentation	financial information and competitively
4		titled "Epic Injunction	sensitive information, which if publicly
5		Implementation"	disclosed would put Apple at a competitive disadvantage in the
			marketplace.
6	CX-0505.21	Email from T. Washburn to M.	This exhibit should be partially sealed
7		Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
0		Deck for 6/28" attaching presentation	financial information and competitively
8		titled "Epic Injunction Implementation"	sensitive information, which if publicly disclosed would put Apple at a
9		Implementation	competitive disadvantage in the
10			marketplace.
10	CX-0505.22	Email from T. Washburn to M.	This exhibit should be partially sealed
11		Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
12		Deck for 6/28" attaching presentation titled "Epic Injunction	financial information and competitively sensitive information, which if publicly
		Implementation"	disclosed would put Apple at a
13			competitive disadvantage in the
14			marketplace.
1.5	CX-0505.23	Email from T. Washburn to M. Fischer et al re "Updated Wisconsin	This exhibit should be partially sealed because it contains Apple's non-public
15		Deck for 6/28" attaching presentation	financial information and competitively
16		titled "Epic Injunction	sensitive information, which if publicly
17		Implementation"	disclosed would put Apple at a
1 /			competitive disadvantage in the
18	CX-0505.24	Email from T. Washburn to M.	marketplace. This exhibit should be partially sealed
19	CA-0303.24	Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
		Deck for 6/28" attaching presentation	financial information and competitively
20		titled "Epic Injunction	sensitive information, which if publicly
21		Implementation"	disclosed would put Apple at a competitive disadvantage in the
22			marketplace.
22	CX-0505.25	Email from T. Washburn to M.	This exhibit should be partially sealed
23		Fischer et al re "Updated Wisconsin	because it contains Apple's non-public
24		Deck for 6/28" attaching presentation	financial information and competitively
		titled "Epic Injunction Implementation"	sensitive information, which if publicly disclosed would put Apple at a
25		Imprementation	competitive disadvantage in the
26			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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CX-0509.1 to CX-0509.2 "Wisconsin: Team Commission Follow-Up" "Team Commission Follow-Up" Team Commission Team Commission Follow-Up" Team Commission This exhibit should be partially seale because it contains Apple's personal identifying information of individual affiliated with Apple which if public disclosed would aid bad actors to obtancess to confidential Apple information.  CX-0538.1 to CX-0538.5 The Email from J. Brown to K. Vij and T. This exhibit should be partially seale because it contains Apple's personal identifying information of individual affiliated with Apple information of unumbers and links to cloud documen which if publicly disclosed would aid actors to obtain access to confidentia Apple information.  CX-0538.1 Email from J. Brown to K. Vij and T. This exhibit should be partially seale because it contains Apple's personal identifying information of individual affiliated with Apple information.  CX-0538.1 Email from J. Brown to K. Vij and T. This exhibit should be partially seale because it contains Apple's personal identifying information of individual affiliated with Apple information.  This exhibit should be partially seale because it contains Apple's personal identifying information of individual affiliated with Apple information.	Exhibit and Page	Exhibit Description	Basis to Seal
CX-0509.1 to CX-0509.2 "Virtual Meeting Invitation titled "Wisconsin: Team Commission Follow-Up" This exhibit should be partially seale because it contains personal information.  CX-0511.1 Text Messages between C. Oliver and K. Vij This exhibit should be partially seale because it contains personal information.  CX-0532.1 Email from S. Cameron to K. Adams et al re Epic Injunction Implementation  CX-0538.1 to CX-0538.5 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.2 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.2 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.2 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  CX-0538.2 Email from J. Brown to K. Vij and T. Washburn r	CX-0506.2		This exhibit should be partially sealed
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numbers and links to cloud documen which if publicly disclosed would aid actors to obtain access to confidentia Apple information.  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck  Deck  This exhibit should be partially seale because it contains Apple's non-publ financial information, competitively sensitive information, and an internation codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and		Deck	1
which if publicly disclosed would aid actors to obtain access to confidentia Apple information.  CX-0538.1 Email from J. Brown to K. Vij and T. Washburn re Updated Wisconsin Deck This exhibit should be partially seale because it contains Apple's non-publ financial information, competitively sensitive information, and an internation codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and			
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CX-0538.1 Email from J. Brown to K. Vij and T.  Washburn re Updated Wisconsin Deck because it contains Apple's non-publ financial information, competitively sensitive information, and an internal codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and			actors to obtain access to confidential
Washburn re Updated Wisconsin Deck  because it contains Apple's non-publ financial information, competitively sensitive information, and an internal codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and			Apple information.
Deck financial information, competitively sensitive information, and an internal codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and	CX-0538.1	Email from J. Brown to K. Vij and T.	This exhibit should be partially sealed
sensitive information, and an internal codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and		<u>-</u>	because it contains Apple's non-public
codename which if publicly disclosed would put Apple at a competitive disadvantage in the marketplace and		Deck	= = =
would put Apple at a competitive disadvantage in the marketplace and			The state of the s
disadvantage in the marketplace and			
out actors to commit access to confide			
Apple information.			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL

HEARING EXS.

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	E 1919		
1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0539.1	Text Messages between N. Barton and	This exhibit should be partially sealed
3		K. Vij	because it contains personal information of Apple employees, as well as
4			confidential links to Apple's internal
5			meeting sites which could aid a bad actor in obtaining commercially sensitive information.
6	CX-0539.6	Text Messages between N. Barton and	This exhibit should be partially sealed
7		K. Vij	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a competitive disadvantage in the
10	CX-0539.10	Text Messages between N. Barton and	marketplace This exhibit should be partially sealed
11	CA 0337.10	K. Vij	because it contains Apple's non-public
12			financial information and competitively sensitive information, which if publicly
13			disclosed would put Apple at a
14			competitive disadvantage in the marketplace
15	CX-0539.12	Text Messages between N. Barton and K. Vij	This exhibit should be partially sealed because it contains Apple's non-public
			financial information and competitively
16			sensitive information, which if publicly disclosed would put Apple at a
17			competitive disadvantage in the marketplace
18	CX-0539.20	Text Messages between N. Barton and	This exhibit should be partially sealed
19		K. Vij	because it contains Apple's non-public financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a competitive disadvantage in the
22	CX-0539.21	Toyt Massagas between N. Porton and	marketplace
23	CA-0339.21	Text Messages between N. Barton and K. Vij	This exhibit should be partially sealed because it contains Apple's non-public
24			financial information and competitively sensitive information, which if publicly
25			disclosed would put Apple at a
26			competitive disadvantage in the marketplace
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	71015	
	Page	Exhibit Description	Basis to Seal
2	CX-0539.22	Text Messages between N. Barton and	This exhibit should be partially sealed
3		K. Vij	because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
7			disclosed would put Apple at a
5			competitive disadvantage in the
6	CYY 0.500.0 (		marketplace
	CX-0539.26	Text Messages between N. Barton and K. Vij	This exhibit should be partially sealed because it contains Apple's non-public
7		K. VIJ	financial information and competitively
8			sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-0539.27	Tout Massacra between N. Douten and	marketplace
	CA-0339.27	Text Messages between N. Barton and K. Vij	This exhibit should be partially sealed because it contains Apple's non-public
11			financial information and private
12			information relating to third parties or
13			concerning the business of third parties,
13			which if revealed would put Apple and
14			third parties at a competitive disadvantage in the marketplace.
15	CX-0539.31	Text Messages between N. Barton and	This exhibit should be partially sealed
		K. Vij	because it contains personal information
16			of Apple employees, as well as
17			confidential links to Apple's internal meeting sites which could aid a bad
			actor in obtaining commercially sensitive
18			information.
19	CX-0540.1	Text Messages among M. Goldberg,	This exhibit should be partially sealed
20		F. Sainz, H. Smith	because it contains personal information
20			of Apple employees, as well as confidential links to Apple's internal
21			meeting sites which could aid a bad
22			actor in obtaining commercially sensitive
			information.
23	CX-0859.25	Presentation titled "Epic Injunction	This exhibit should be partially sealed
24		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
			sensitive information, which if publicly
25			disclosed would put Apple at a
26			competitive disadvantage in the
27			marketplace.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0859.27	Presentation titled "Epic Injunction	This exhibit should be partially sealed
3		Implementation Proposal"	because it contains Apple's non-public
			financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
			marketplace.
6	CX-0859.28	Presentation titled "Epic Injunction	This exhibit should be partially sealed
7		Implementation Proposal"	because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
°			disclosed would put Apple at a
9			competitive disadvantage in the
10			marketplace. Additionally, this slide
			reflects confidential information
11	CX-0859.30	Presentation titled "Epic Injunction	concerning third parties.  This exhibit should be partially sealed
12	24 0037.30	Implementation Proposal"	because it contains Apple's non-public
1.2			financial information and competitively
13			sensitive information, which if publicly
14			disclosed would put Apple at a competitive disadvantage in the
15			marketplace.
	CX-0859.31	Presentation titled "Epic Injunction	This exhibit should be partially sealed
16		Implementation Proposal"	because it contains Apple's non-public
17			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
18			competitive disadvantage in the
19			marketplace.
20	CX-0859.32	Presentation titled "Epic Injunction	This exhibit should be partially sealed
20		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
21			sensitive information, which if publicly
22			disclosed would put Apple at a
			competitive disadvantage in the
23	CX-0859.33	Presentation titled "Epic Injunction	marketplace. This exhibit should be partially sealed
24	CA-0039.33	Implementation Proposal"	because it contains Apple's non-public
25		1	financial information and competitively
23			sensitive information, which if publicly
26			disclosed would put Apple at a
27			competitive disadvantage in the marketplace.
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0859.37	Presentation titled "Epic Injunction	This exhibit should be partially sealed
3		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a
3			competitive disadvantage in the marketplace.
6	CX-0859.39	Presentation titled "Epic Injunction	This exhibit should be partially sealed
7		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
10	CX-0859.40	Presentation titled "Epic Injunction	This exhibit should be partially sealed
11		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
14	CX-0859.42	Presentation titled "Epic Injunction	This exhibit should be partially sealed
15		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
16			sensitive information, which if publicly
17			disclosed would put Apple at a competitive disadvantage in the
18			marketplace.
	CX-0859.43	Presentation titled "Epic Injunction Implementation Proposal"	This exhibit should be partially sealed because it contains Apple's non-public
19		Implementation Proposal	financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a competitive disadvantage in the
22			marketplace.
23	CX-0859.44	Presentation titled "Epic Injunction Implementation Proposal"	This exhibit should be partially sealed because it contains Apple's non-public
		Implementation i roposai	financial information and competitively
24			sensitive information, which if publicly
25			disclosed would put Apple at a competitive disadvantage in the
26			marketplace.

1	Exhibit and		
	Page	Exhibit Description	Basis to Seal
2	CX-0859.45	Presentation titled "Epic Injunction	This exhibit should be partially sealed
3		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
6	CX-0859.46	Presentation titled "Epic Injunction	This exhibit should be partially sealed
7		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly
9			disclosed would put Apple at a competitive disadvantage in the
10			marketplace.
	CX-0859.47	Presentation titled "Epic Injunction Implementation Proposal"	This exhibit should be partially sealed because it contains Apple's non-public
11		Implementation Proposal	financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14	GY 0050 54		marketplace.
15	CX-0859.54	Presentation titled "Epic Injunction Implementation Proposal"	This exhibit should be partially sealed because it contains Apple's non-public
			financial information and competitively
16			sensitive information, which if publicly disclosed would put Apple at a
17			competitive disadvantage in the
18	CX-0859.55	Presentation titled "Epic Injunction	marketplace.  This exhibit should be partially sealed
19	CA-0839.33	Implementation Proposal"	because it contains Apple's non-public
20			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
21			competitive disadvantage in the
22	CX-0859.75	Presentation titled "Epic Injunction	marketplace. This exhibit should be partially sealed
23		Implementation Proposal"	because it contains Apple's non-public
24			financial information and competitively sensitive information, which if publicly
25			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
26			marketpiace.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL

HEARING EXS.

1 Exhibit and Page	Exhibit Description	Basis to Seal
2 CX-0859.76	Presentation titled "Epic Injunction	This exhibit should be partially sealed
3	Implementation Proposal"	because it contains Apple's non-public
		financial information and competitively
4		sensitive information, which if publicly disclosed would put Apple at a
5		competitive disadvantage in the
6		marketplace.
6 CX-0859.77	Presentation titled "Epic Injunction	This exhibit should be partially sealed
7	Implementation Proposal"	because it contains Apple's non-public financial information and competitively
8		sensitive information, which if publicly
9		disclosed would put Apple at a competitive disadvantage in the
10		marketplace.
10 CX-0859.78	Presentation titled "Epic Injunction	This exhibit should be partially sealed
11	Implementation Proposal"	because it contains Apple's non-public
12		financial information and competitively sensitive information, which if publicly
		disclosed would put Apple at a
13		competitive disadvantage in the
14		marketplace.
CX-0859.79	Presentation titled "Epic Injunction	This exhibit should be partially sealed
15	Implementation Proposal"	because it contains Apple's non-public financial information and competitively
16		sensitive information, which if publicly
17		disclosed would put Apple at a
17		competitive disadvantage in the
18 CX-0859.81	Presentation titled "Epic Injunction	marketplace.  This exhibit should be partially sealed
19	Implementation Proposal"	because it contains Apple's non-public
		financial information and competitively
20		sensitive information, which if publicly
21		disclosed would put Apple at a
		competitive disadvantage in the marketplace.
22 CX-0859.82	Presentation titled "Epic Injunction	This exhibit should be partially sealed
23	Implementation Proposal"	because it contains Apple's non-public
24		financial information and competitively
		sensitive information, which if publicly
25		
26		marketplace.
24 25 26		sensitive information, whi disclosed would put Appl competitive disadvantage

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-0859.83	Presentation titled "Epic Injunction	This exhibit should be partially sealed
3		Implementation Proposal"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6			marketplace. Additionally, this slide reflects confidential information
7	CX-0859.85	Description tided "Freig Leismotion	concerning third parties.
8	CA-0839.83	Presentation titled "Epic Injunction Implementation Proposal"	This exhibit should be partially sealed because it contains Apple's competitively
9			sensitive information, which if publicly disclosed would put Apple at a
10			competitive disadvantage in the
11			marketplace. Additionally this slide includes confidential information relating
12	CX-1104	Email from A. Thai to J. Brown, B.	to third parties  This exhibit should be partially sealed
13	(pages 1 to 2)	Cote, J. Phillips, T. Liu, and J.	because it contains Apple's personal
		Magnani re "Fwd: Wisconsin Design Deliverables"	identifying information of individuals affiliated with Apple which if publicly
14			disclosed would aid bad actors to obtain
15	CX-1208.1	Direct Message Exchanges between B.	access to confidential Apple information. This exhibit should be partially sealed
16		Cote, J. Magnani, R. Onak, and T. Liu	because it contains personal information of Apple employees, confidential links to
17			Apple's internal meeting sites, and two
18			of Apple's confidential codenames, which could aid a bad actor in obtaining
19			commercially sensitive information.
20	CX-1208.2	Direct Message Exchanges between B. Cote, J. Magnani, R. Onak, and T. Liu	This exhibit should be partially sealed because it contains two of Apple's
21			confidential codenames which if publicly disclosed would aid bad actors to obtain
22			access to confidential Apple information.
23	CX-1208.3	Direct Message Exchanges between B. Cote, J. Magnani, R. Onak, and T. Liu	This exhibit should be partially sealed because it contains one of Apple's
		Coo, J. Magham, R. Ohak, and T. Liu	confidential codenames which if publicly
24			disclosed would aid bad actors to obtain access to confidential Apple information.
25		1	
26			
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	E 1945	n
	Page	Exhibit Description	Basis to Seal
2	CX-1208.4	Direct Message Exchanges between B.	This exhibit should be partially sealed
3		Cote, J. Magnani, R. Onak, and T. Liu	because it contains personal information
4			of Apple employees, confidential links to Apple's internal meeting sites, and
4			Apple's confidential codenames which
5			could aid a bad actor in obtaining
6			commercially sensitive information.
١	CX-1208.5	Direct Message Exchanges between B.	This exhibit should be partially sealed
7		Cote, J. Magnani, R. Onak, and T. Liu	because it contains personal information of Apple employees, as well as
8			confidential links to Apple's internal
١			meeting sites which could aid a bad
9			actor in obtaining commercially sensitive
10			information.
	CX-1210.1	Direct Message Exchanges between	This exhibit should be partially sealed
11		A. Savio, J. Woo, R. Onak, and S. Krueger re "Wisconsin"	because it contains personal information of Apple employees, as well as
12		Krueger re Wisconsin	confidential links to Apple's internal
			meeting sites which could aid a bad actor
13			in obtaining commercially sensitive
14	CV 1011 1		information.
1.5	CX-1211.1	Direct Message Exchanges between J. Phillips, J. Magnani, and R. Onak	This exhibit should be partially sealed because it contains personal information
15		Finnips, J. Magnani, and K. Oliak	of Apple employees, as well as
16			confidential links to Apple's internal
17			meeting sites which could aid a bad actor
1 /			in obtaining commercially sensitive
18	CX-1211.2 to	Direct Message Exchanges between J.	information.
19	CX-1211.2 to CX-1211.3,	Phillips, J. Magnani, and R. Onak	This exhibit should be partially sealed because it contains one of Apple's
17	CX-1211.5	i imips, v. Magnam, and re. Shak	confidential codenames which if publicly
20			disclosed would aid bad actors to obtain
21			access to confidential Apple information.
	CX-1303.2	Presentation titled "Business Risks	This exhibit should be partially sealed
22		Update"	because it contains Apple's non-public financial information and competitively
23			sensitive information, which if publicly
			disclosed would put Apple at a
24			competitive disadvantage in the
25			marketplace. Additionally, this slide
26			reflects confidential information concerning a third party.
26		1	concerning a unita party.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and	Exhibit Description	Dacis to Saal
2	Page	Exhibit Description	Basis to Seal
2	CX-1303.3	Presentation titled "Business Risks	This exhibit should be partially sealed
3		Update"	because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
4			disclosed would put Apple at a
5			competitive disadvantage in the
			marketplace.
6	CX-1303.9	Presentation titled "Business Risks	This exhibit should be partially sealed
7		Update"	because it contains Apple's non-public
0			financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the
10			marketplace.
10	CX-1303.12	Presentation titled "Business Risks	This exhibit should be partially sealed
11		Update"	because it contains Apple's non-public
10			financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
			marketplace.
14	CX-1303.15	Presentation titled "Business Risks	This exhibit should be partially sealed
15		Update"	because it contains Apple's non-public
1.0			financial information and private
16			information relating to third parties or
17			concerning the business of third parties, which if publicly disclosed would put
10			Apple and third parties at a competitive
18			disadvantage in the marketplace.
19	CX-1303.19	Presentation titled "Business Risks	This exhibit should be partially sealed
20		Update"	because it contains Apple's non-public
20			financial information and competitively
21			sensitive information, which if publicly disclosed would put Apple at a
22			competitive disadvantage in the
22			marketplace.
23	CX-1303.20	Presentation titled "Business Risks	This exhibit should be partially sealed
24		Update"	because it contains Apple's non-public
<b>24</b>			financial information and private
25			information relating to third parties or concerning the business of third parties,
26			which if publicly disclosed would put
ا ۵			Apple and third parties at a competitive
27			disadvantage in the marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-1303.21	Presentation titled "Business Risks	This exhibit should be partially sealed
3		Update"	because it contains Apple's non-public financial information and private
4			information relating to third parties or concerning the business of third parties,
5			which if publicly disclosed would put
6			Apple and third parties at a competitive disadvantage in the marketplace.
7	CX-1303.22	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
9			disclosed would put Apple at a
10	CV 1202 55		competitive disadvantage in the marketplace.
11	CX-1303.23	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
12			financial information and private information relating to third parties or
13			concerning the business of third parties, which if publicly disclosed would put
14			Apple and third parties at a competitive
15	CX-1303.24	Presentation titled "Business Risks	disadvantage in the marketplace.  This exhibit should be partially sealed
16		Update"	because it contains Apple's non-public
17			financial information and private information relating to third parties or
18			concerning the business of third parties, which if publicly disclosed would put
19			Apple and third parties at a competitive disadvantage in the marketplace.
20	CX-1303.26	Presentation titled "Business Risks Update"	This exhibit should be partially sealed
21		Opuate	because it contains Apple's non-public financial information and competitively
22			sensitive information, which if publicly disclosed would put Apple at a
23			competitive disadvantage in the marketplace.
24	CX-1303.27	Presentation titled "Business Risks	This exhibit should be partially sealed
25		Update"	because it contains Apple's non-public financial information and competitively
26			sensitive information, which if publicly disclosed would put Apple at a
27			competitive disadvantage in the
28			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and		
1	Page	Exhibit Description	Basis to Seal
2	CX-1303.28	Presentation titled "Business Risks	This exhibit should be partially sealed
3		Update"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6			marketplace.
	CX-1303.29	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
7		Opune	financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-1303.30	Presentation titled "Business Risks	marketplace.
11	CA-1303.30	Update"	This exhibit should be partially sealed because it contains Apple's non-public
12			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
13			competitive disadvantage in the
14	CX-1303.31	Presentation titled "Business Risks	marketplace.  This exhibit should be partially sealed
15		Update"	because it contains Apple's non-public
16			financial information and competitively sensitive information, which if publicly
17			disclosed would put Apple at a
			competitive disadvantage in the marketplace.
18	CX-1303.32	Presentation titled "Business Risks	This exhibit should be partially sealed
19		Update"	because it contains Apple's non-public financial information and competitively
20			sensitive information, which if publicly
21			disclosed would put Apple at a competitive disadvantage in the
22			marketplace.
23	CX-1303.34	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
		- r	financial information and competitively
24			sensitive information, which if publicly disclosed would put Apple at a
25			competitive disadvantage in the
26			marketplace.
27			

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-1303.37	Presentation titled "Business Risks Update"	This exhibit should be partially sealed
3		Opuate	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6	CX-1303.40	Presentation titled "Business Risks	marketplace. This exhibit should be partially sealed
7		Update"	because it contains Apple's non-public financial information and private
8			information relating to third parties or
9			concerning the business of third parties, which if publicly disclosed would put
10			Apple and third parties at a competitive
11	CX-1303.41	Presentation titled "Business Risks	disadvantage in the marketplace.  This exhibit should be partially sealed
12		Update"	because it contains Apple's non-public financial information and private
13			information relating to third parties or
			concerning the business of third parties, which if publicly disclosed would put
14			Apple and third parties at a competitive
15	CX-1303.42	Presentation titled "Business Risks	disadvantage in the marketplace.  This exhibit should be partially sealed
16		Update"	because it contains Apple's non-public
17			financial information and private information relating to third parties or
18			concerning the business of third parties, which if publicly disclosed would put
19			Apple and third parties at a competitive
20	CX-1303.43	Presentation titled "Business Risks	disadvantage in the marketplace.  This exhibit should be partially sealed
21		Update"	because it contains Apple's non-public
22			financial information and private information relating to third parties or
23			concerning the business of third parties, which if publicly disclosed would put
			Apple and third parties at a competitive
24			disadvantage in the marketplace.
25			
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DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-1303.44	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
3		Opuate	financial information and private
4			information relating to third parties or concerning the business of third parties,
5			which if publicly disclosed would put Apple and third parties at a competitive
6	GY 1202 45	D : 1 1 (D : D: 1	disadvantage in the marketplace.
7	CX-1303.45	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
9			disclosed would put Apple at a
10			competitive disadvantage in the marketplace.
11	CX-1303.46	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
12			financial information and competitively sensitive information, which if publicly
13			disclosed would put Apple at a
14			competitive disadvantage in the marketplace.
15	CX-1303.47	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
16		opunie	financial information and private
17			information relating to third parties or concerning the business of third parties,
18			which if publicly disclosed would put Apple and third parties at a competitive
19	CX-1303.48	Presentation titled "Business Risks	disadvantage in the marketplace.  This exhibit should be partially sealed
20	CA-1303.46	Update"	because it contains Apple's non-public
21			financial information and private information relating to third parties or
22			concerning the business of third parties, which if publicly disclosed would put
23			Apple and third parties at a competitive
24			disadvantage in the marketplace.
25			
26			

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1	Exhibit and	Exhibit Description	Basis to Seal
2	Page CX-1303.49	Presentation titled "Business Risks	This exhibit should be partially sealed
3		Update"	because it contains Apple's non-public financial information and private
4			information relating to third parties or concerning the business of third parties,
5			which if publicly disclosed would put Apple and third parties at a competitive
6			disadvantage in the marketplace.
7	CX-1303.50	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
8			financial information and competitively sensitive information, which if publicly
9			disclosed would put Apple at a
10			competitive disadvantage in the marketplace.
11	CX-1303.51	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
12		Opune	financial information and competitively
13			sensitive information, which if publicly disclosed would put Apple at a
14			competitive disadvantage in the marketplace. Additionally, this slide
15			reflects confidential information
16	CX-1303.52	Presentation titled "Business Risks	concerning third parties.  This exhibit should be partially sealed
17		Update"	because it contains Apple's non-public financial information and competitively
18			sensitive information, which if publicly
19			disclosed would put Apple at a competitive disadvantage in the marketplace.
20	CX-1303.53	Presentation titled "Business Risks	This exhibit should be partially sealed
21		Update"	because it contains Apple's non-public financial information and competitively
22			sensitive information, which if publicly disclosed would put Apple at a
23			competitive disadvantage in the marketplace.
24	CX-1303.54	Presentation titled "Business Risks	This exhibit should be partially sealed
25		Update"	because it contains Apple's non-public financial information and competitively
26			sensitive information, which if publicly
27			disclosed would put Apple at a competitive disadvantage in the
28			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	<b>Exhibit Description</b>	Basis to Seal
2 3	CX-1303.60	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
4			financial information and competitively sensitive information, which if publicly
5			disclosed would put Apple at a competitive disadvantage in the
6			marketplace. Additionally, this slide reflects confidential information
7	CX-1303.61	Presentation titled "Business Risks	concerning third parties.  This exhibit should be partially sealed
8	CA-1303.01	Update"	because it contains Apple's non-public
9			financial information and competitively
			sensitive information, which if publicly disclosed would put Apple at a
10			competitive disadvantage in the
11			marketplace.
12	CX-1303.62	Presentation titled "Business Risks	This exhibit should be partially sealed
12		Update"	because it contains Apple's non-public financial information and competitively
13			sensitive information, which if publicly
14			disclosed would put Apple at a
			competitive disadvantage in the
15	CV 1202 62	Presentation titled "Business Risks	marketplace.
16	CX-1303.63	Update"  Business Risks	This exhibit should be partially sealed because it contains Apple's non-public
17			financial information and competitively
18			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the
19			marketplace. Additionally, this slide reflects confidential information
20	CV 1202 (4		concerning third parties.
21	CX-1303.64	Presentation titled "Business Risks Update"	This exhibit should be partially sealed because it contains Apple's non-public
22			financial information and competitively
23			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the
24			marketplace.
25			
26			

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1	Exhibit and Page	Exhibit Description	Basis to Seal
2	CX-1303.65	Presentation titled "Business Risks	This exhibit should be partially sealed
3		Update"	because it contains Apple's non-public
			financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the
6			marketplace.
0	CX-1304.2	Presentation titled "Wisconsin	This exhibit should be partially sealed
7		Financials Follow-Up"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly
			disclosed would put Apple at a
9			competitive disadvantage in the
10	CX-1304.3	Presentation titled "Wisconsin	marketplace. This exhibit should be partially sealed
11	CA 1504.5	Financials Follow-Up"	because it contains Apple's non-public
			financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14			marketplace.
14	CX-1304.4	Presentation titled "Wisconsin	This exhibit should be partially sealed
15		Financials Follow-Up"	because it contains Apple's non-public
16			financial information and competitively sensitive information, which if publicly
			disclosed would put Apple at a
17			competitive disadvantage in the
18	CX 1204 5	D dd 1//XY	marketplace.
19	CX-1304.5	Presentation titled "Wisconsin Financials Follow-Up"	This exhibit should be partially sealed because it contains Apple's non-public
19		Timulcius Tollow Cp	financial information and private
20			information relating to third parties or
21			concerning the business of third parties,
22			which if revealed would put Apple and third parties at a competitive
22			disadvantage in the marketplace.
23	CX-1304.6	Presentation titled "Wisconsin	This exhibit should be partially sealed
24		Financials Follow-Up"	because it contains Apple's non-public
			financial information and competitively sensitive information, which if publicly
25			disclosed would put Apple at a
26			competitive disadvantage in the
27			marketplace.

DECLARATION OF MARK A. PERRY ISO APPLE INC.'S STATEMENT ISO MOTION TO SEAL HEARING EXS.

1	Exhibit and Page	<b>Exhibit Description</b>	Basis to Seal
2	CX-1304.7	Presentation titled "Wisconsin	This exhibit should be partially sealed
3		Financials Follow-Up"	because it contains Apple's non-public financial information and competitively
4			sensitive information, which if publicly disclosed would put Apple at a
5			competitive disadvantage in the marketplace.
6	CX-1304.8	Presentation titled "Wisconsin	This exhibit should be partially sealed
7		Financials Follow-Up"	because it contains Apple's non-public financial information and competitively
8			sensitive information, which if publicly disclosed would put Apple at a
9			competitive disadvantage in the
0	CX-1304.10	Presentation titled "Wisconsin	marketplace. This exhibit should be partially sealed
11		Financials Follow-Up"	because it contains Apple's non-public financial information and competitively
12			sensitive information, which if publicly
13			disclosed would put Apple at a competitive disadvantage in the
14	CV 1204 11		marketplace.
15	CX-1304.11	Presentation titled "Wisconsin Financials Follow-Up"	This exhibit should be partially sealed because it contains Apple's non-public
16			financial information and competitively sensitive information, which if publicly
17			disclosed would put Apple at a competitive disadvantage in the
18			marketplace.
19	CX-1304.12	Presentation titled "Wisconsin Financials Follow-Up"	This exhibit should be partially sealed because it contains Apple's non-public
20			financial information and competitively
21			sensitive information, which if publicly disclosed would put Apple at a
			competitive disadvantage in the marketplace.
22	CX-1310.1	Text Messages between C. Oliver and	This exhibit should be partially sealed
23		K. Vij	because it contains personal information of Apple employees, as well as
24			confidential links to Apple's internal meeting sites which could aid a bad actor
25			in obtaining commercially sensitive
26			information.

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